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US ARMY CORPS OF ENGINEERS, NEW YORK DISTRICT
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25 August 2026

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SUBJECT: Final Five-Year Review for the Former Seneca Army Depot in Romulus, NY; EPA Site ID# NY0213820830 and NY Site ID# 8-50-006

Dear Ms. Treinen, Mr. Powers, and Mr. Sergott:

On behalf of the Army, please find attached for your records the Final Five-Year Review for the Former Seneca Army Depot, located in Romulus, New York.

If you have any questions about the attached document, please call me at 917-936-6273.

Sincerely,

HEINS.THOMAS.ROBERT.1599821364

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FIVE-YEAR REVIEW
FINAL

Former Seneca Army Depot
Romulus, New York

PREPARED FOR:

U.S. Army Corps of Engineers
Engineering And Support Center, Huntsville
300 Secured Gateway SW
Huntsville, Alabama 35898



CONTRACT NO. W912DY22D0131
TASK ORDER NO. W912DY22F0374

August 2026

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Five-Year Review
Former Seneca Army Depot
Romulus, New York

Contract No. W912DY22D0131
Task Order No. W912DY22F0374

Prepared for

U.S. Army Corps of Engineers
Engineering and Support Center
Huntsville
300 Secured Gateway SW
Huntsville, Alabama 35898



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Final
Five-Year Review
Former Seneca Army Depot
Romulus, New York

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Thomas R. Heins, P.E.
Seneca Army Depot BRAC Environmental Coordinator
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LIST OF ACRONYMS AND ABBREVIATIONS

ºF	degrees Fahrenheit
µg/dL	micrograms per deciliter
µg/L	microgram(s) per liter
%	percent
AFFF	aqueous film-forming foam
AOC	area of concern
AQCR	Air Quality Control Program
ARAR	Applicable or Relevant and Appropriate Requirement
ASD	Office of Assistant Secretary of Defense
ASR	Archives Search Report
AWQS	Ambient Water Quality Standards
bgs	below ground surface
BRAC	Base Realignment and Closure
BTEX	benzene, toluene, ethylbenzene, and xylene
CCR	Construction Completion Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
CLP	Contract Laboratory Program
COC	contaminant of concern
cPAH	carcinogenic polycyclic aromatic hydrocarbon
cy	cubic yard(s)
DCE	dichloroethene
DDE	dichlorodiphenyldichloroethylene
DDESB	Department of Defense Explosive Safety Board
DoD	Department of Defense
DPW	Department of Public Works
DRMO	Defense Reutilization and Marketing Office
EA	EA Engineering, Science, and Technology, Inc., PBC
EBS	Environmental Baseline Survey
EE/CA	Engineering Evaluation/Cost Analysis
EOD	explosive ordnance disposal
EPA	U.S. Environmental Protection Agency
EPC	exposure point concentration
ESI	expanded site investigation
EVO	emulsified vegetable oil
FFA	Federal Facilities Agreement
FS	feasibility study
FYR	Five-Year Review

HA	health advisory
HI	hazard index
HQ	hazard quotient
IC	institutional control
IRFNA	inhibited red-fuming nitric acid
LRA	Local Redevelopment Authority
LTM	long-term monitoring
LUC	land use control
MCL	maximum contaminant level
MD	munitions debris
MEC	munitions and explosives of concern
mm	millimeter(s)
MPPEH	material potentially presenting an explosive hazard
MRS	munitions response site
NA	not applicable/available
NCFL	Non-Combustible Fill Landfill
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
NPL	National Priorities List
NYCRR	New York State Code of Rules and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
OB	open burning
OD	open detonation
OE	ordnance and explosives
OU	operable unit
PAH	polycyclic aromatic hydrocarbon
PAL	project action limit
PCB	polychlorinated biphenyl
PFAS	per- and polyfluoroalkyl substances
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PID	Planned Industrial/Office Development
ppb	part(s) per billion
ppm	part(s) per million
RAO	remedial action objective
RCRA	Resource Conservation and Recovery Act
RD	remedial design

RI	remedial investigation
RME	reasonable maximum exposure
ROD	Record of Decision
RSL	regional screening level
SAR	Small Arms Range
SCIDA	Seneca County Industrial Development Agency
SCO	soil cleanup objective
SEAD	Former Seneca Army Depot
SI	site investigation
SLERA	screening level ecological risk assessment
SOW	Statement of Work
SWMU	solid waste management unit
SVOC	semivolatile organic compound
TAGM	Technical and Administrative Guidance Memorandum
TAL	target analyte list
TCE	trichloroethene
TCL	target compound list
TCRA	Time-Critical Removal Action
TPH	total petroleum hydrocarbons
TSDF	treatment, storage, and disposal facility
UCL	upper confidence limit
USACE	U.S. Army Corps of Engineers
UU/UE	unlimited use/unrestricted exposure
UXO	unexploded ordnance
VC	vinyl chloride
VOC	volatile organic compound

EXECUTIVE SUMMARY

This is the fourth Five-Year Review (FYR) for the Former Seneca Army Depot (SEAD) site located in Seneca County, New York. The purpose of this FYR is to review information to determine if the remedies are and will continue to be protective of human health and the environment.

This review found that the remedies at each area of concern function as intended by the Decision Documents and are protective of human health and the environment. The exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the signature of the Record of Decision are still valid. There have been no changes in the exposure pathways or in the physical condition of the sites that would affect the protectiveness of the remedy since completion of the remedial action activities, and there have been no changes in the implementation of land use controls that would affect the protectiveness of the remedies.

1. INTRODUCTION

This Five-Year Review (FYR) was conducted on behalf of the U.S. Army Corp of Engineers (USACE) in pursuant to Section 121 (c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, Section 300.430 (f) (4) (ii) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and Office of Solid Waste and Emergency Response Directive 9355.7-03B-P (June 2001). The purpose of a FYR is to evaluate the implementation and performance of a remedy in order to determine if the remedy is or will be protective of human health and the environment. Protectiveness is generally defined in the NCP by the risk range and the hazard index (HI). The risk range and HI are estimated to determine the incremental probability of an individual developing health effects (carcinogenic or non-carcinogenic) over a lifetime because of exposure to a contaminant of concern (COC). Evaluation of the remedy and the determination of protectiveness should be based on and sufficiently supported by the data and observations. The FYR is required because hazardous substances, pollutants, or contaminants remain at the Former Seneca Army Depot (SEAD) site located in Seneca County, New York (**Figure 1**) above levels that allow for unlimited use and unrestricted exposure. The trigger date for this FYR was 30 August 2021.

In 1995, SEAD was designated for closure under the Department of Defense (DoD) Base Realignment and Closure (BRAC) process. To address employment and economic impacts associated with the closure of SEAD, the Seneca County Board of Supervisors established the Seneca Army Depot Local Redevelopment Authority (LRA) in October 1995. The primary responsibility assigned to the LRA was to prepare a plan for redevelopment of the SEAD property. Following a comprehensive planning process, a Reuse Plan and Implementation Strategy for Seneca Army Depot was completed and adopted by the LRA on 8 October 1996. The Seneca County Board of Supervisors subsequently approved this Reuse Plan on 22 October 1996. In 2005, after it had acquired portions of SEAD from USACE, the Seneca County Industrial Development Agency (SCIDA) changed the planned use of land in many portions of the Depot. **Figure 2** depicts the intended future land uses for SEAD, as modified by SCIDA.

The CERCLA sites requiring a FYR are provided in **Table 1**, and a site chronology is presented in **Table 2**. A listing of all historical areas of concern (AOCs) that have been the subject of CERCLA investigations at SEAD and their current disposition is provided in **Table 3**. A crosswalk to the AOCs and associated SEADs is provided in **Table 4**.

SEAD consists of 22 operable units (OUs) and 84 SEADs (i.e., individual AOCs specific to SEAD). Historically, the Records of Decision (RODs) generally combined AOCs by OU and added no action/no further action sites based on timing; however, the remedial approach was targeted at individual or groups of AOCs and not by the OU designation. For consistency with the historical designations used throughout the site and remedial investigation (RI) documents, Construction Completion Reports (CCRs), and RODs, the issues/recommendations and protectiveness statements are per AOC instead of per OU.

As of the date of this report, RODs have been signed for 83 out of 84 AOCs at SEAD. AOCs with signed RODs are listed in **Tables 3 and 4**. Consistent with CERCLA requirements, a 5-year statutory review is required for a site with a ROD signed on or after 17 October 1986 if upon completion of the remedial action, hazardous substances, pollutants, or contaminants will remain

onsite. Of the 83 AOCs, 4 AOCs were delisted from the National Priorities List (NPL) in 1998 due to reuse initiatives; SEAD-50 and SEAD-54 were delisted for a sheriff's office, and SEAD-24 and SEAD-58 were delisted for a planned ethanol plant. As such, this document provides a FYR for the 42 AOCs listed in **Table 1** that require a FYR. Of the remaining 42 AOCs, 41 (38 sites plus SEAD-65A, B, and C) AOCs have been closed with a no action or no further action determination and are not addressed in this review (USACE 2003b). Currently, there is one OU (SEAD-45) that is under assessment and does not have a signed ROD as of the date of this FYR. Although the signed ROD for SEAD-23 does not have established LUCs, the ROD specifies operations and maintenance requirements, and therefore, SEAD-23 was included as part of this FYR.

2. REPORT STRUCTURE

The report is organized such that general information and summary statements common to all the AOCs are contained in the main body of the report. Each AOC with LUC requirements is detailed in a dedicated appendix. The appendices are organized into six areas which have common or similar land use and LUCs. The six areas, and the AOCs within them, are organized as follows:

- Appendices A through O – Planned Industrial/Office Development (PID) and Warehousing Area: SEADs 1, 2, 5, 16, 17, 25, 26, 27, 39, 40, 59, 64A, 66, 67, 71, 121C, and 121I
- Appendices P through U – Prison Area: SEADs 43, 44A, 44B, 52, 56, 62, 64C, and 69
- Appendix V, X, Y, and AB – Other Areas: SEADs 13, 64B and 64D, and 12
- Appendix W – North End Institutional Area: SEAD-41
- Appendix Z – Ash Landfill Operable Unit: SEADs 3, 6, 8, 14, and 15
- Appendix AA – Airfield Parcel: SEADs 122B and 122E
- Appendix AC through AF – Former Munitions Response Sites with LUC requirements: SEADs 46, 003-R-01, 007-R-01, and 002-R-01
- Appendix AG – Open Burning (OB) Grounds: SEAD-23

Each appendix reviews the area-specific background information, basis for taking action, summary of remedial actions, and technical assessment for the applicable AOC(s). The structure of the appendices are as follows:

- Area Specific Background Information
  - History of Contamination
  - Initial Response
  - Basis for Taking Action
  - Contaminants of Concern
  - Human Health and Ecological Risk Assessment
- Remedial Actions
  - Remedy Selection
  - Remedy Implementation
  - System Operations/Operation and Maintenance
- Progress Since Last Five-Year Review

- Five-Year Review Process
  - Document Review
  - Data Review
  - Site Inspection
  - Interviews
  - Institutional Controls Verification

- Technical Assessment
  - Question A: Is the remedy functioning as intended by the decision documents?
  - Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy still valid?
  - Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

- Issues, Recommendations and Follow-Up Actions

- Protectiveness Statement

In each appendix, the FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**. **Tables 1 and 3** identify the CERCLA sites reviewed in the FYR with the corresponding LUCs or institutional controls (ICs) required by the RODs.

3. GENERAL BACKGROUND

3.1 PHYSICAL CHARACTERISTICS

SEAD is located approximately 40 miles south of Lake Ontario in Seneca County, New York (**Figure 1**). SEAD lies immediately west of the Town of Romulus, New York, 12 miles south of the villages of Waterloo and Seneca Falls, and 2.5 miles north of the Town of Ovid, New York. The two closest major cities are Rochester, New York, which is located approximately 60 miles northwest, and Syracuse, New York, which is located approximately 60 miles northeast. Prior to the acquisition of the land by DoD in 1941, the property was privately owned and was used principally as homesteads and for agriculture.

SEAD is located in an uplands area, where the ground elevation ranges from approximately 600 feet along the western boundary of the Depot to nearly 760 feet in the central portion of the eastern boundary. The uplands area where SEAD 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 SEAD to the east and west, respectively.

The geology of the area is characterized by Pleistocene age (Wisconsin event, 20,000 years ago) glacial till deposits overlying shale bedrock (Ludlowville and Moscow Formations). The till matrix varies locally but generally consists of horizons of unsorted silt, clay, sand, and gravel. In the central and eastern portions of SEAD, the till is thin and bedrock is exposed or within 3 feet of the surface. Throughout SEAD, the thickness of the glacial till deposits generally range from 1 to 15 feet.

Darien silt-loam soils, 0 to 18 inches thick, have developed over Wisconsin age glacial tills. These soils are developed on glacial till where they overlie the shale. In general, the topographic relief associated with these soils is from 3 to 8 percent (%).

A cool climate exists at SEAD with temperatures ranging from an average of 31 degrees Fahrenheit (°F) in January to 69°F in July. Marked temperature differences are found between daytime highs and nighttime lows during the summer and portions of the transitional seasons. Precipitation is well distributed, averaging approximately 3 inches per month. This precipitation is derived principally from cyclonic storms, which pass from the interior of the county through the St. Lawrence Valley. Seneca, Cayuga, and Ontario Lakes provide a significant amount of the winter precipitation and moderate the local climate. The annual average snowfall is approximately 100 inches. Wind velocities are moderate, but during the winter months, there are numerous days with sufficient winds to cause blowing and drifting snow. The most frequently occurring wind directions are westerly and west southwesterly.

SEAD is located in the Genesee-Finger Lakes Air Quality Control Region (AQCR). The AQCR is designated as non-attainment for ozone and attainment or unclassified for all other criteria pollutants. Data for the existing air quality in the area that surrounds the SEAD cannot be obtained since the nearest state air quality stations (Rochester of Monroe County or Syracuse of Onondaga County) are 40 to 50 miles away from the Depot and are not representative of the conditions at SEAD. A review of the data for Rochester, which is in the same AQCR as SEAD,

indicates that all monitored pollutants (sulfur dioxide, particulates, carbon monoxide, lead, and ozone) are below state and federal limits, with the exception of ozone. In 1987, the maximum ozone concentration observed in Rochester was 0.127 parts per million (ppm); however, this value is not representative of the SEAD area which is a more rural environment.

3.2 SITE GEOLOGY/HYDROGEOLOGY

The Finger Lakes uplands area is underlain by a broad north-to-south trending series of rock terraces mantled by glacial till. As part of the Appalachian Plateau, the region is underlain by a tectonically undisturbed sequence of Paleozoic rocks consisting of shale, sandstone, conglomerate, limestone, and dolostone. In the vicinity of SEAD, Devonian age (approximately 385 million years ago) rocks of the Hamilton Group are monoclinally folded and dip gently to the south. The Hamilton Group is a sequence of limestone, calcareous shale, siltstone, and sandstone.

SEAD geology is characterized by gray Devonian shale with a thin weathered zone where it contacts the overlying mantle of Pleistocene glacial till. This stratigraphy is consistent over the entire SEAD facility. The predominant surficial geologic unit present at the site is dense glacial till. The till is distributed across the entire facility and ranges in thickness from less than 2 feet to as much as 15 feet although it is generally only a few feet thick. The till is generally characterized by brown to gray-brown silt, clay and fine sand with few fine-to-coarse gravel-sized inclusions of weathered shale. Larger diameter weathered shale clasts (as large as 6 inches in diameter) are more prevalent in basal portions of the till.

The bedrock underlying the northwestern half of the site is composed of the Ludlowville Formation. The southeastern half of the site is underlain by the Moscow Formation. Both formations are Devonian in age and part of the Hamilton Group. Regionally, the bedrock is vertically jointed in three predominant directions: northeast, north-northwest, and east-northeast (Mozola 1951). Within the Hamilton Group, many of the gray-black, calcareous shales are fissile and exhibit parting (or separation) along bedding planes.

Regionally, four distinct hydrologic units were identified by Mozola (1951) within Seneca County. From north to south, the oldest of these, located in northern Seneca County, is the Camillus shale of the Salina Group. A series of younger limestone units extends east-west across Geneva and Seneca Falls. South of Geneva, a thick series of shale formations are present. Unconsolidated beds of Pleistocene glacial drift, and recent deposits, overlie the bedrock units. Water yield from the glacial units and shales is generally poor. Overall, the groundwater in the county is very hard, and therefore, the quality is minimally acceptable for use as potable water.

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; Crain 1974). The geologic cross-sections suggest that a groundwater divide exists approximately halfway between the two Finger Lakes. SEAD is located on the western slope of this divide and therefore regional groundwater flow is expected to be primarily westward towards Seneca Lake. Local hydrogeology is overall consistent with regional hydrogeology.

Surface drainage from SEAD flows to five primary creeks (**Figure 2**). In the southern portion of the Depot, the surface drainage flows through man-made drainage ditches and streams into Indian and Silver Creeks. These creeks then merge and flow into Seneca Lake just south of the former airfield. The central and administration area of SEAD 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 SEAD's former Lake Shore Housing Area. The majority of the northwestern and north-central portion of SEAD drains into Reeder Creek. Reeder Creek flows predominantly northwesterly and leaves SEAD 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 SEAD, which includes a marshy area called the Duck Pond, drains into Kendig Creek and then flows north into the Cayuga-Seneca Canal and to Cayuga Lake. Other minor creeks are also present and drain portions of the Depot.

3.3 LAND AND RESOURCE USE

In October 1995, SEAD was designated for closure under the DoD BRAC process. As part of the BRAC process, USACE commissioned an Environmental Baseline Survey (EBS) of SEAD. 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 SEAD. 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 Category 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 U.S. Army BRAC 95 Program EBS Report (USACE 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 SEAD was added to the 1995 BRAC list, the primary objective of USACE was expanded from performing RIs and completing necessary remedial actions to include the release of non-affected portions of SEAD 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 SEAD was first defined and approved by the Seneca County LRA in 1996. The planned use for portions of SEAD was modified by SCIDA in 2005.

Ecological site characterizations conducted at SEAD were based on compilation of existing ecological information and on-site reconnaissance activities. The methods used to characterize the ecological resources included site-walkovers for the evaluation of existing wildlife and vegetative communities; interviews with local, state, and SEAD resource personnel; and review of environmental data obtained from previous USACE reports. Ecological communities identified at SEAD included successional old-field areas, successional shrub areas, and

successional hardwoods areas. Animals that have been identified at SEAD during various ecological surveys include beaver, eastern coyote, white-tailed deer, red and gray fox, eastern cottontail rabbit, muskrat, raccoon, gray squirrel, striped skunk, and the woodchuck. Bird species that have been identified include the blue jay, black-capped chickadee, American crow, mourning dove, northern flicker, ruffed grouse, ring-billed gull, red- tailed hawk, northern junco, American kestrel, white breasted nuthatch, ring-necked pheasant, American robin, eastern starling, turkey vulture, and pileated woodpecker.

3.4 HISTORY OF CONTAMINATION

Between 1941 and 2000, SEAD was owned by the U.S. Government and operated by the Department of the Army. SEAD 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. SEAD was selected for closure by the DoD in 1995; its military mission terminated in September 1999, and the installation was closed in September 2000. The history of contamination for each AOC is described in further detail in the individual appendices.

3.5 INITIAL RESPONSE

SEAD was proposed for the NPL in July 1989. In August 1990, the listing of SEAD as an NPL site was finalized in Group 14 on the Federal Section. After SEAD was listed on the NPL, USACE, U.S. Environmental Protection Agency (EPA), and New York State Department of Environmental Conservation (NYSDEC) identified 57 solid waste management units (SWMUs) 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 EPA, NYSDEC, and USACE negotiated and finalized a Federal Facilities Agreement (FFA) for the site in 1993 (USACE, EPA, and NYSDEC 1993).

The FFA established whether SWMUs required action or not. If no action was required at a SWMU it was closed out and documented in a 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 USACE finalized the SWMU Classification Report (USACE 1994a) in 1994.

SEAD 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, USACE 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. The 72 AOCs included 4 areas (SEAD-12 A and B; SEAD-44 A and B; SEAD-64 A, B, C, and D; and SEAD-65 A, B, and C) that consisted of multiple sites (for a total of 79 sites to be investigated).

Once SEAD was selected and approved for closure as part of the BRAC 1995 process, USACE commissioned an EBS to assess the condition of all property relative to its status under CERFA guidance and the DoD BRAC Cleanup Plan guidebook. At the conclusion of this effort, approximately 1,945 of the 10,634 acres of land within the Depot including all of the land previously designated as SWMUs and several additional properties not previously designated as sites of interest were classified as CERFA Category 5, 6 or 7 sites (i.e., not suitable for transfer, pending further investigation and remediation). Subsequently in 1998, the USACE authorized and conducted site inspections and limited site investigations (SIs) of 32 additional potential sites identified as CERFA Category 5 – 7 properties, and because of these efforts an additional 4 sites (SEADs 121C, 121I, 122B, and 122E) were classified as AOCs requiring further assessment and actions under CERCLA.

Per the requirements of BRAC properties, where ordnance had been located, USACE also commissioned an Ordnance and Explosives (OE) Archives Search and conducted site inspections to: 1) identify all areas where ordnance activities occurred; 2) assess the likelihood that ordnances remained due to historical activities; and 3) make recommendations regarding the areas that required further action or investigation. Based on these assessments and evaluations, two additional SWMUs (SEAD 007-R-01, and SEAD 002-R-01, that consisted of two separate areas, explosive ordnance disposal [EOD]-2 and EOD-3) were added to the list of sites that were to be assessed under CERCLA. Additionally, the DOD Munitions Response program required USACE to rename and regroup sites that involved munitions (e.g., SEAD xxxx-R-01 designation). Any site with a prior SEAD –XX number is called an “alias” in the DoD reporting system.

Finally, in 1998, once USACE had completed its initial investigations of SEAD-12 (Radiological Waste Burial Sites) and begun a more comprehensive RI, SEAD-12A and SEAD-12B were consolidated into SEAD-12, an area encompassing more than 350 acres at the north end of the Depot and subject to continuing CERCLA investigations. Based on these additions, sites investigated under CERCLA rose from the 72 listed in the FFA to 78, the 4 EBS sites (SEADs 121C, 121I, 122B, and 122E), and the 2 OE SWMUs (SEADs 002-R-01, including EOD-2) resulting in 84 sites.

3.6 BASIS FOR TAKING ACTION

The basis for taking action for each AOC is described in further detail in the individual appendices. Generally, an action was required at the AOCs to ensure the remedy or land use remains protective of site users. The COCs and results of the human health and ecological risk assessments at each AOC are summarized in the individual appendices. 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 $1 \times 10^{-6,}$ and if the calculated non-cancer HI were less than 1.0. Guidelines suggest that HQs less than 1 present no probable risk, while HQs greater than or equal than 1 present the potential for environmental effects.”

4. SUMMARY OF REMEDIAL ACTIONS LUC OBJECTVES

The specific elements that composed the remedy for each AOC are discussed in further detail in the individual AOC appendices. The RODs for each AOC require the implementation of land use controls (LUCs) that will continue until the concentrations of hazardous substances in the soil and groundwater are reduced to levels that allow for unlimited use and unrestricted exposure (UU/UE). A summary of the LUCs for the AOCs is presented in this section. **Tables 1 and 3** identify the CERCLA sites reviewed in the FYR with the corresponding LUCs or ICs required by the RODs. For real estate parcels that have been transferred, the responsibility of implementing LUC/ICs has been transferred to the new owner. LUC/ICs have been implemented as deed restrictions and environmental easements.

4.1 SUMMARY OF PID/WAREHOUSE AREA LUC OBJECTIVES AND RESTRICTIONS

Seventeen AOCs (SEADs 1, 2, 5, 16, 17, 25, 26, 27, 39, 40, 59, 64A, 66, 67, 71, 121C, and 121I) located within the PID/Warehousing Area are subject to LUC inspection. Based on the planned reuse of the PID/Warehousing Area by the SCIDA, the entirety of the PID/Warehousing Area and the AOCs within this area are subject to ICs in the form of two common LUC objectives (USACE 2004b, 2004d, 2005a, 2006e, 2007a, 2008b, 2009a, 2009b):

- Prohibit the development and use of property for residential housing, elementary and secondary schools, childcare facilities and playground activities.

- Prevent access to or use of the groundwater until New York State (NYS) Class GA Groundwater Standards are met.

Additionally, a LUC is enforced at SEAD-5 and SEAD-64A where unauthorized excavation is prohibited, and at SEAD-25 and SEAD-26 to maintain the integrity of any current or future remedial or monitoring system.

The LUC remedial design (RD) for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area (USACE 2002a, 2006f, 2007e, 2008e).

4.2 SUMMARY OF PRISON AREA LUC OBJECTIVES AND RESTRICTIONS

The "Prison Area" consists of eight SWMUs (SEADs 43, 44A, 44B, 52, 56, 62, 64C, and 69) that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of the former Depot to the people of the State of New York for the construction of the Five Points Correctional Facility.

Provisions of the deed apply to the following AOCs, SEADs 43, 44A, 44B, 52, 56, 62, 64C, and 69, which were transferred prior to a ROD being prepared and which currently are located within the bounds of the State of New York Five Points Correctional Facility Parcel. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a). The Prison Area LUC requires:

- The continued restricted use of the property as a state maximum security correctional facility.

4.3 SUMMARY OF THE AIRFIELD PARCEL LUC OBJECTIVES AND RESTRICTIONS

Two AOCs within the Airfield Parcel are subject to LUCs, SEAD-122B: Small Arms Range, Airfield Parcel and SEAD- 122E: Plane Deicing Area (USACE 2007a, 2008e). A residential activities LUC was instituted on both AOCs as follows:

- The development and use of property for residential housing, elementary or secondary schools, childcare facilities, and playgrounds will be prohibited.

4.4 SUMMARY OF ASH LANDFILL OPERABLE UNIT LUC OBJECTIVES AND RESTRICTIONS

Five AOCs (SEADs 3, 6, 8, 14, and 15) are located within the Ash Landfill OU and are subject to ICs including LUCs (USACE 2006b, 2008f). The LUC performance objectives include:

- Preventing access to or use of groundwater until cleanup levels are met.
- Maintaining the integrity of any current or future remedial or monitoring system such as monitoring wells and permeable reactive barriers.
- Prohibiting excavation of the soil or construction of habitable structures (temporary or permanent) above the area of the existing groundwater plume.
- Maintain the vegetative soil layer over the ash fill areas and the Non-Combustible Fill Landfill to limit ecological contact.

4.5 SUMMARY OF NORTH END INSTITUTIONAL AREA LUC OBJECTIVES AND RESTRICTIONS

One AOC (SEAD-41) within the North End Institutional Area is subject to LUCs (USACE 2007a, 2008a). Historical groundwater data led USACE to impose a restriction on groundwater use for SEAD-41 and all of the properties within the North End Institutional Area as follows:

- Prohibit access to or use of groundwater at SEAD-41 until concentrations of hazardous substances contained are reduced to levels that allow unrestricted use.

4.6 SUMMARY OF THE LUCs OBJECTIVES AND RESTRICTIONS AT THE FORMER MUNITIONS RESPONSE SITES

Four AOCs (SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007-R-01) that are former munition response sites (MRSs) are subject to LUCs (USACE 2017, 2019b). The MRS LUCs are as follows:

- Prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities, or playgrounds through the use of LUCs.

- Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the SEAD MRSs.

4.7 SUMMARY OF THE LUC OBJECTIVES AND RESTRICTIONS FOR AOCS IN OTHER AREAS

Three AOCs (SEAD 13, 64B, and 64D) were inspected within the SEAD former ammunition storage area (USACE 2007a, 2008e). A summary of the LUCs implemented at these three areas of concern are as follows:

- Prevent access to or use of the groundwater until NYS Class GA Groundwater Standards are met (SEAD-13 and SEAD-64D).

- Maintain the integrity of any current or future remedial or monitoring systems (SEAD-13 and SEAD-64D).

- Restriction on unauthorized excavation or digging within SEAD-64B and SEAD-64D.

SEAD-12 was inspected within the high security area (USACE 2002d, 2015a, 2015b). A summary of the LUCs implemented at SEAD-12 are as follows:

- Restrict access to and use of the existing vacant Buildings 813/814 and the construction of inhabitable structures (temporary or permanent) above the area and within a 50-foot perimeter of Buildings 813/814 and 50-foot radius from MW12-37 where trichloroethene-contaminated soil was previously identified, and where contaminated groundwater may exist.

- Prohibit access to and use of groundwater in the vicinity of Buildings 813/814.

- Prohibit the development and use of the property for residential housing, elementary and secondary schools, childcare facilities and playgrounds until soil and groundwater standards for UU/UE are achieved.

5. PROGRESS SINCE LAST FIVE-YEAR REVIEW

In general, for AOCs that had recommendations in the previous FYR, the LUC recommendations were implemented as intended. In most AOCs the recommendation in the last FYR was to continue the implementation of LUCs and the annual frequency of periodic reviews. This recommendation was implemented as intended in all cases. Where an inspection was not permitted (Prison Area), the continued implementation of LUCs were confirmed via interview. Annual LUC inspections were conducted yearly in 2021, 2022, 2023, 2024, 2025, and 2026 at other AOCs. Based on annual inspections, the LUCs are functioning as intended.

AOCs where it was recommended to re-evaluate the risk due to changes in toxicity values to determine if UU/UE conditions can be met were evaluated as part of this FYR to determine if the remedies are still protective of the environment and human health. The recommendation of additional media sample collection was not conducted during this review period. AOCs where optimizations are recommended, detail this recommendation in their respective appendix. Optimization will be reviewed and recommendations will be provided under separate cover following the acceptance of this FYR

Other site-specific recommendations and their implementation status can be found in the appendix files for SEAD-16 (Appendix D), SEAD-25 (Appendix H), SEAD-26 (Appendix I), SEAD-3/6/8/14/15 (Appendix Z), SEAD-122B and -122E (Appendix AA), and SEAD-23, OB Grounds (Appendix AG). All recommendations made in the previous FYR are either completed or ongoing.

6. FIVE-YEAR REVIEW PROCESS

6.1 ADMINISTRATIVE COMPONENTS

EA Engineering and Geology, P.C. on behalf of EA Engineering, Science, and Technology, Inc. PBC (EA) in consultation with USACE conducted this FYR.

6.2 COMMUNITY INVOLVEMENT

USACE relies on public input to ensure that community concerns are considered during the FYR. This document will be made available to the public through an online Administrative Record portal. USACE will perform site-specific outreach to the community, such as placing an ad in the local newspaper, to inform them that the FYR is being conducted.

The EPA will notify the community that the FYR is being conducted. The announcement and any comments received will be posted on the EPA website[1].

6.3 DOCUMENT REVIEW

This FYR includes a review of relevant information contained in a variety of the multi-site related documents. The documents, data, and information reviewed to complete this fourth FYR are summarized in Section 11 – References. The information reviewed primarily focused on documents produced after signature of the RODs but also included information from pre-ROD documents to provide historical site information and contaminant extent.

6.4 DATA REVIEW

No data were reviewed as part of the FYR process, except for the AOCs with ongoing long-term monitoring (LTM). Discussions of the LTM data reviewed for the Ash Landfill (SEADs -3,-6, -8, -14, and -15), SEAD-16, SEAD-23, and SEAD-25 are presented in the individual AOC appendices.

6.5 SITE INSPECTION

The AOCs included as part of the FYR process were inspected in July 2021, June 2022, June 2023, May 2024, March 2025, and February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs from the 2026 inspection are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2** of each appendix. The photographic log for **Appendix Z** utilized photographs from the 2025 LUC inspection. Please note that photographs are not permitted inside the correction facility so an updated aerial image is used in its place for AOCs located inside of the correctional facility boundary. Specific observations made during AOC site inspections are presented in the individual AOC appendices.

1 https://www.epa.gov/superfund/R2-fiveyearreviews

6.6 INTERVIEWS

No interviews were conducted during the FYR process for those AOCs that are uninhabited and unoccupied. Interviews were conducted at the Prison Area to confirm that the property is operating as a state maximum security correctional facility.

6.7 INSTITUTIONAL CONTROLS VERIFICATION

The LUCs, Environmental Easements, and deed restrictions are in place for each AOC included in this fourth FYR. The LUC performance objectives are listed in each site-specific appendix.

7. TECHNICAL ASSESSMENT

7.1 QUESTION A: IS THE REMEDY FUNCTIONING AS INTENDED BY THE DECISION DOCUMENTS?

Yes, remedial actions required by completed RODs for AOCs at SEAD have been completed and documented. Optimization work is currently ongoing at the Ash Landfill to address offsite contaminate migration. Based on a review of Closure Reports, LUC RD, LTM reports, Environmental Easements, transfer deeds (as applicable) and the FYR site visit conducted in February 2026, all remedies are functioning as intended by the decision documents with the exception of the Ash Landfill.

7.2 QUESTION B: ARE THE EXPOSURE ASSUMPTIONS, TOXICITY DATA, CLEANUP LEVELS, AND REMEDIAL ACTION OBJECTIVES USED AT THE TIME OF THE REMEDY STILL VALID?

- The exposure assumptions for protection of human health and ecological receptors and remedial action objectives used at the time of the remedy are still valid.

- There have been no changes in the exposure pathway or changes in the physical condition of the sites since completion of remedial action activities and implementation of LUCs that would affect the protectiveness of the selected remedies.

- Changes in toxicity data are discussed in the Technical Assessment of each AOCs respective appendix.

7.3 QUESTION C: HAS ANY OTHER INFORMATION COME TO LIGHT THAT COULD CALL INTO QUESTION THE PROTECTIVENESS OF THE REMEDY?

According to the data reviewed and the annual LUC inspections, the remedy is functioning as intended by the RODs with the exception of the Ash Landfill. The exposure assumptions, toxicity data, cleanup levels, and RAOs used at the time of the remedy are still protective, but some toxicity data have changed. Very little development or site use has occurred within the AOCs and there have been no changes in the physical condition of the sites that would affect the protectiveness of the remedy. Applicable or Relevant and Appropriate Requirement (ARARs) cited in the RODs remain protective of human health and the environment.

In response to concerns surrounding the presence of emerging contaminants at former fire training areas, USACE launched an SI in 2017 at three previously investigated sites (SEAD-25, SEAD-26, and SEAD-122E). SEAD-25 and SEAD-26 were formerly used as fire training sites and SEAD-122E is located on a former airfield where firefighting response actions may have taken place. The SI was conducted to determine whether the areas were contaminated with per- and polyfluoroalkyl substances (PFAS). During the SI, concentrations of the two primary PFAS constituents, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS), were measured below the former EPA lifetime health advisory (HA) level in all 24 of the wells installed and sampled at SEAD-122E (USACE 2018). Following a 2022 comparison to updated state maximum contaminant levels (MCL) and Office of the Assistant Secretary of Defense

(ASD) guidance the PFAS investigation at SEAD-122E has proceeded to the RI stage. Due to its close proximity to SEAD-122E, SEAD-122B is also being investigated as part of the RI (USACE 2023). The investigation of SEAD-25 and SEAD-26 for PFAS progressed to an expanded site investigation (ESI). The results from the ESI indicate that SEAD-25 and SEAD-26 are primary source areas for PFAS. Groundwater results indicate that PFAS were detected within the upper water bearing zone (overburden) with little impacts to the lower water bearing zone (bedrock). Source areas soils likely contribute to elevated concentrations of PFAS above the project action limits to groundwater through leaching. Surface water concentrations within the AOCs and downgradient are impacted with PFAS. Both SEAD-25 and SEAD-26 exhibit PFAS signatures consistent with former AFFF use; however, the signatures are not consistent between the sites suggesting the use of various formulations of AFFF over the site history or potentially different environmental conditions which are affecting the fractionation of the various individual PFAS differently (USACE 2022a). SEAD-25 and SEAD-26 are currently being investigated as part of the PFAS RI at the site. Currently, the remedy in place for SEAD-25, SEAD-26, SEAD-122B, and SEAD-122E is for the contaminants identified in the ROD, which did not include PFAS as this contaminant had not been known at the time of the ROD. However, potential PFAS interim remedies such as GAC treatment via an interceptor wall downgradient of SEAD-25 are being investigated for their feasibility to reduce the migration of PFAS through Kendaia Creek. There are no known completed groundwater exposure pathways at these sites. A fourth AOC, Fire house (Building 103), is also being investigated as part of the RI but is not yet subject to the CERCLA process and is not discussed in this FYR. The RI being conducted is intended to further characterize potential PFAS sources and potential pathways for contaminant migration near the suspected source areas. RI outcomes are not final at the time of this review.

Following the completion of Historical Record Review in February 2022, 34 sites at SEAD were recommended to proceed to SI (USACE 2022b). Of the 34 sites, 20 are subject to FYR due to ongoing remedy implementation. Sites that are subject to this FYR are bold. SI outcomes are not final at the time of this review. The SI sites are as follows:

- **SEAD-002-R-01, EOD Area #2 and #3; OU11**
- SEAD-22, Sewerage 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 Pile, 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 Sewage 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-21, Sewage Treatment Plant # 715, OU14
- Fire House Building 722

There is no other new information of significance that would affect the protectiveness of the remedies.

8. ISSUES/RECOMMENDATIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

9. PROTECTIVENESS STATEMENT

Based upon the review conducted by USACE of the CERCLA sites at SEAD, determinations have been made identifying whether the remedies selected remain protective of human health and the environment. The determinations are detailed in each site-specific appendix.

The remedy implemented for the AOCs included in the PID Warehousing Areas, Prison Area, Airfield Parcel, Ash Landfill OU, North End Institutional Area, MRSs, and SEAD-12, SEAD-13, SEAD-64B, and SEAD-64D is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Evaluation of the remedies will be conducted again in the next FYR.

10. NEXT REVIEW

The next FYR for the SEAD should be completed before 30 September 2031.

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Tables

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Table 1. SEAD CERCLA Sites Summary

Area of Concern
Planned Industrial Development (PID)Warehouse Area
SEAD-1 Hazardous Waste Container Storage Facility (Building 307)
SEAD-2 PCB Transformer Storage Facility (Building 301)
SEAD-5 Sewage Sludge Piles
SEAD-16 Building S311, (former) Abandoned Deactivation Furnace
SEAD-17 Building 367, (former) Active Deactivation Furnace
SEAD-25 Fire Training and Demonstration Pad
SEAD-26 Fire Training Pit
SEAD-27 Building 360 Steam Cleaning Waste Tank
SEAD-39 Building 121 Boiler Plan Blowdown Leach Pit
SEAD-40 Building 319 Boiler Plant Blowdown Leach Pit
SEAD-59 Fill Area West of Building 135
SEAD-64A Garbage Disposal Area, Debris Landfill south of Storage Pad
SEAD-66 Pesticide Storage Area near Buildings 5 and 6
SEAD-67 Dump Site east of Sewage Treatment Plant No. 4
SEAD-71 Alleged Paint Disposal Area
SEAD-121C Defense Reutilization and Marketing Office (DRMO) Yard
SEAD-121I Rumored Cosmoline Disposal Area
Prison Area
SEAD-43 Old Missile Propellant Test Lab
SEAD-44A Quality Assurance Test Laboratory
SEAD-44B Quality Assurance Test Laboratory
SEAD-52 Buildings 608 and 612 – Ammunition Breakdown Are
SEAD-56 Herbicide and Pesticide Storage
SEAD-62 Nicotine Sulfate Disposal Area near Buildings 606 and 612
SEAD-64C Garbage Disposal Area
SEAD-69 Building 606 Disposal Area
Other SEADs with LUC Requirements
SEAD-12 Radioactive Waste Burial Sites
SEAD-13 Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Site
SEAD-23 Open Burning Ground
SEAD-64B Garbage Disposal Area, Disposal Area South of Classification Area
SEAD-64D Garbage Disposal Area West of Building 2203
North End Barracks Area
SEAD-41 Building 718 Boiler Plant Blowdown Leach Pit
Airfield Parcel
SEAD-122B Small Arms Range, Airfield
SEAD-122E Plane Deicing Areas
Ash Landfill Operable Unit
SEAD 3 Incinerator Cooling Water Pond
SEAD-6 Abandoned Ash Landfill
SEAD-8 Non-Combustible Landfill
SEAD-14 Refuse Burning Pits
SEAD-15 Building 2207 – Abandoned Solid Waste Incinerator
Former Munitions Response Sites (MRSs)
SEAD-46 Small Arms Range (aka 3.5-inch Rocket Range)
SEAD 003-R-01 Explosive Ordnance Disposal Area (#1) (SEAD-57)
SEAD 007-R-01 Grenade Range
SEAD 002-R-01 Explosive Ordnance Disposal Areas #2 and #3

Table 2. Chronology of Site Events

Site Chronology Events	Date
U.S. Army announced decision to build depot and acquires land (~10,600 acres).	6/11/1941
U.S. Army begins construction of the Seneca Ordnance Depot	7/9/1941
SEAD proposed for the NPL	7/14/1989
SEAD was finalized and listed in Group 14 on the Federal Section of the NPL.	8/30/1990
The Federal Facility Agreement signed between EPA, NYSDEC, and the Army.	1/1/1993
SEAD was approved for closure under BRAC.	10/1/1995
Seneca Army Depot LRA created by Seneca County Board of Supervisors.	10/1/1995
The Reuse Plan was approved by the LRA and Seneca County Board of Supervisors.	10/22/1996
The Environmental Baseline Study was completed (Nov 13 - Dec 12, 1995) and reported.	10/29/1996
ROD signed for Former Open Burning Grounds Site.	6/14/1999
Institutional use at the former administration area in the northern end of the former depot property.	7/1/2000
Depot transfers Prison Parcel to New York State.	9/26/2000
SEAD was officially closed.	9/30/2000
Seneca County Industrial Development Agency were transferred 9,500 acres (7,000 acres from conservation area, 900 acres from Planned Industrial Development/Warehouse Area (PID Area), and 500 acres from airfield parcel).	9/30/2003
ROD signed for 20 No Action SWMUs and 8 No Further Action SWMUs.	11/12/2003
26 acres of former depot property was transferred for creation of a county jail.	12/31/2003
ROD signed for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas (SEADs 27, 64A, and 66).	9/28/2004
ROD signed for the Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD-26)	9/29/2004
ROD signed for the Ash Landfill Operable Unit Including Sites (SEADs 3, 6, 8, 14, 15).	1/21/2005
ROD signed for No Further Actions for SWMUs SEAD 50/54	9/28/2005
ROD signed for Debris Area Near Booster Station 2131 (SEAD-58) and Miscellaneous Components Burial Site (SEAD-63)	9/28/2006
ROD signed for the Abandoned Deactivation Furnace (SEAD-16) and the Active Deactivation Furnace (SEAD-17)	9/29/2006
ROD signed for the 17 SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)	7/3/2007
SEAD-24, SEAD-50, SEAD-54, and SEAD-58 delisted from NPL.	4/28/2008
ROD signed for the DRMO Yard (SEAD-121C) and the Rumored Cosmoline Oil Disposal Area (SEAD-121I).	8/7/2008
ROD signed for the Munitions Washout Facility (SEAD-4) and the Building 2079 Boiler Blowdown Pit (SEAD-38).	9/22/2008
ROD signed for the Fill Area West of Building 135 (SEAD-59) and the Alleged Paint Disposal Area (SEAD-71).	3/31/2009
ROD signed for Five Former SWMUs (SEAD 1, 2, 5, 24, 48)	5/6/2009
ROD signed for the Old Construction Debris Landfill (SEAD-11)	9/25/2009
A total of 9,808 acres transferred as of FY2009 with 878 acres remaining.	2/1/2010
First Five Year Review (Draft)	7/20/2011
ROD signed for Radioactive Waste Burial Sites (SEAD-12) and Mixed Waste Storage Facility (SEAD-72).	3/30/2015
ROD signed for Four Munitions Response Sites (SEAD-46, SEAD 003-R-01 [SEAD-57], SEAD-002-R-01, and SEAD 007-R-01) and SEAD 70	3/30/2017

Notes:

BRAC = Base Realignment and Closure

DRMO = Defense Reutilization and Marketing Office

EPA = U.S. Environmental Protection Agency

FY = Fiscal Year

LRA = Local Redevelopment Authority

NPL = National Priorities List

NYSDEC = New York State Department of Environmental Conservation

PID = Planned Industrial/Office Development

ROD = Record of Decision

SEAD = Former Seneca Army Depot

SWMU = solid waste management unit

Table 3. LUC Requirements

Site Number	Site Name	Operable Unit (OU)	Tax Map	Owner	Survey Status[a] (PLS, GPS, None)	LUC Requirements								
						Prohibit Residential, Schools, Childcare Facilities, & Playgrounds	Prohibit Construction of Inhabitable Structures (temporary or permanent)	GW Use Restriction (Prohibit Access or Use of)	GW LTM Required	Unauthorized Excavation Restriction	Maintain Soil Cap and/or Vegetative Cover	Maintain Remedial & Monitoring Wells System	Continued Restricted Use as Correctional Facility	3R Explosives Safety Education Program
Planned Industrial/Office Development (PID)/Warehouse Area														
SEAD-1	Hazardous Waste Container Storage Facility (Building 307)	OU13	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-2	PCB Transformer Storage Facility (Building 301)	OU13	02-1-01	Deer Haven Park, LLC	GPS	X		X						
SEAD-5	Sewage Sludge Storage Piles	OU13	08-1-03.4	Seneca Depot LLC	GPS	X		X		X	X			
SEAD-16	Building S311, Abandoned Deactivation Furnace	OU4	08-1-03.5	Seneca Depot LLC	GPS	X		X	X					
SEAD-17	Building 367, Active Deactivation Furnace	OU4	08-1-03.5	Seneca Depot LLC	GPS	X		X	X					
SEAD-25	Fire Training and Demonstration Pad	OU3	08-1-03.5	Seneca Depot LLC	GPS	X		X	X			X		
SEAD-26	Fire Training Pit	OU3	08-1-03.5	Seneca Depot LLC	GPS	X		X	X[1]					
SEAD-27	Steam Cleaning Waste Tank (Building 360)	OU12	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-39	Building 121 Boiler Plant Blowdown Leach Pit	OU17	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-40	Building 319 Boiler Plant Blowdown Leach Pit	OU17	08-1-03.5	Seneca Depot LLC	None	X		X						
SEAD-59	Fill Area West of Building 135	OU6	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-64A	Garbage Disposal Area, South of Storage Pad	OU12	08-1-03.5	Seneca Depot LLC	GPS	X		X		X				
SEAD-66	Pesticide Storage Area near Buildings 5 and 6	OU12	02-1-01	Deer Haven Park, LLC	None	X		X						
SEAD-67	Dump Site east of Sewage Treatment Plant No. 4	OU16 & OU17	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-71	Alleged Paint Disposal Area	OU6	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-121C	Defense Reutilization and Marketing Office (DRMO) Yard	OU21	08-1-03.5	Seneca Depot LLC	GPS	X		X						
SEAD-121I	Rumored Cosmoline Disposal Area	OU21	08-1-03.5	Seneca Depot LLC	GPS	X		X						
Prison Area														
SEAD-43	Building 606 Old Missile Propellant Test Laboratory	OU17	16-1-21	NY State Corrections	None								X	
SEAD-44A	Quality Assurance Test Laboratory, West of Building 616	OU17	16-1-21	NY State Corrections	None								X	
SEAD-44B	Quality Assurance Test laboratory, Brady Road	OU17	16-1-21	NY State Corrections	None								X	
SEAD-52	Building 608 and 612 Ammunition Breakdown Area	OU10 & OU17	16-1-21	NY State Corrections	None								X	
SEAD-56	Building 606 Herbicide and Pesticide Storage	OU17	16-1-21	NY State Corrections	None								X	
SEAD-62	Nicotine Sulfate Disposal Area near Building 606 and 612	OU17	16-1-21	NY State Corrections	None								X	
SEAD-64C	Garbage Disposal Area	OU17	16-1-21	NY State Corrections	None								X	
SEAD-69	Building 606 Disposal Area	OU17	16-1-21	NY State Corrections	None								X	

Table 3. LUC Requirements

Site Number	Site Name	Operable Unit (OU)	Tax Map	Owner	Survey Status[a] (PLS, GPS, None)	LUC Requirements								
						Prohibit Residential, Schools, Childcare Facilities, & Playgrounds	Prohibit Construction of Inhabitable Structures (temporary or permanent)	GW Use Restriction (Prohibit Access or Use of)	GW LTM Required	Unauthorized Excavation Restriction	Maintain Soil Cap and/or Vegetative Cover	Maintain Remedial & Monitoring Wells System	Continued Restricted Use as Correctional Facility	3R Explosives Safety Education Program
Other SEADs with LUC Requirements														
SEAD-12	Radiological Waste Burial Sites	OU5	07-1-44	Seneca County IDA	PLS	X	X	X						
SEAD-13	Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Site	OU9 & OU17	07-1-49	Deer Haven Park, LLC	GPS			X				X[2]		
SEAD-64B	Garbage Disposal Area, South of Classification Area	OU17	02-1-01	Deer Haven Park, LLC	GPS					X	X			
SEAD-64D	Garbage Disposal Area, West of Building 2203	OU17	02-1-01	Deer Haven Park, LLC	GPS			X		X	X	X		
North End Barracks Area														
SEAD-41	Building 718 Boiler Plant Blowdown Leach Pit	OU14	07-1-10.2	Seneca County IDA	None			X						
Airfield Parcel														
SEAD-122B	Small Arms Range, Airfield	OU17	11-1-02	Deer Haven Park, LLC	None	X								
SEAD-122E	Plane Deicing Area	OU17	11-1-02	Deer Haven Park, LLC	None	X								
Ash Landfill Operable Unit														
SEAD-3	Incinerator Cooling Water Pond	OU1	02-1-01	Deer Haven Park, LLC	None[3]		X	X	X	X	X			
SEAD-6	Abandoned Ash Landfill	OU1	02-1-01	Deer Haven Park, LLC	None[3]		X	X	X	X	X			
SEAD-8	Non-Combustible Fill Area	OU1	02-1-01	Deer Haven Park, LLC	None[3]		X	X	X	X	X			
SEAD-14	Refuse Burning Pits (2 units)	OU1	02-1-01	Deer Haven Park, LLC	None[3]		X	X	X	X	X			
SEAD-15	Abandoned Solid Waste Incinerator (Building 2207)	OU1	02-1-01	Deer Haven Park, LLC	None[3]		X	X	X	X	X			
Former Munitions Response Sites (MRSs)														
SEAD-46	Small Arms Range (aka 3.5-inch Rocket Range)	OU11	07-1-49	Deer Haven Park, LLC	PLS	X								X
SEAD 003-R-01	Explosive Ordnance Disposal Area (#1) (SEAD-57)	OU11	07-1-47	Deer Haven Park, LLC	PLS	X								X
SEAD 007-R-01	Grenade Range	OU19	07-1-46	Deer Haven Park, LLC	PLS	X								X
SEAD 002-R-01	Explosive Ordnance Disposal Areas #2 and #3	OU19	07-1-49	Deer Haven Park, LLC	PLS	X								X

Notes:

a) Survey Status: Professional Land Survey (PLS), GPS corner points, None (approximate historic work area).

X[1] – Long-term groundwater monitoring was initially required at SEAD-26 as a condition of the ROD. Groundwater monitoring at SEAD-26 was terminated by the Army, with the approval of the EPA and the NYSDEC after the first year of sampling (2006) after analysis indicated that no COCs were present in the groundwater at concentrations above defined cleanup goals; however, this Site was reopened in 2018 and is the subject of a PFAS investigation.

X[2] - At SEAD-13, the ROD requires that the integrity of any current or future remedial or monitoring system is maintained. All the monitoring wells at SEAD-13 were decommissioned.

None[3] - GPS corner points available for the OU.

EPA = U.S. Environmental Protection Agency

GPS = Global Positioning System

GW = groundwater

LTM = long-term monitoring

LUC = land use control

NYSDEC = New York State Department of Environmental Conservation

PLS = Professional Land Surveyor

ROD - Record of Decision

Table 4. ROD and LUC RD References

OU	Name	SEAD ID	Decision Document Reference
0	Sitewide	NA	NA
1	Ash landfill	SEAD 3, 6, 8, 14, 15	ROD (January 2005)[1]
2	Open burning grounds	SEAD 23	ROD (January 1999)[2]
3	Fire training pad	SEAD 25, 26	ROD (September 2004)[3]
4	Deactivation furnaces	SEAD 16, 17	ROD (March 2006)[4]
5	Radioactive waste sites, etc.	SEAD 12, 72	ROD (March 2015)[5]
6	Fill area/paint disposal	SEAD 59, 71	ROD (March 2009)[6]
7	Munitions washout facility	SEAD 4, 38	ROD (August 2009)[7]
8	Old Construction Debris	SEAD 11	ROD (September 2009)[8]
9	IRFNA disposal site	SEAD 13	ROD (July 2004)[9]
10	Ammunition breakdown area, etc.	SEAD 52, 60	ROD (September 2003)[10]
			ROD (March 2007)[11]
11	Open detonation grounds	SEAD 46, 003-R-01, 002-R-01, 007-R-01, 70	ROD (May 2002)[12]
			ROD (March 2017)[13]
12	Pesticide storage area	SEAD 27, 64A, 66	ROD (May 2002)[12]
			ROD (March 2004)[14]
13	Pitchblende storage	SEAD 48; inc. SEADs 1, 2, 5, 24	ROD (April 2009)[15]
14	Multiple SEAD	No Action: SEADs 7, 9, 10, 18, 19, 20, 21, 22, 33, 35, 36, 37, 42, 47, 49, 51, 53, 55, 65, 68	ROD (May 2002)[12]
		No Further Action: SEADs 28, 29, 30, 31, 32, 34, 58, 60, 61, 63	ROD (September 2003)[10]
		IC Sites: SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and 122E	ROD (March 2007)[11]
15	SEAD 50/54	SEAD 50, 54	ROD (September 2005)[16]
16	DRMO yard	SEAD 121C, 121I	ROD (June 2008)[17]
17	SEAD-45 – OD grounds	SEAD 45	NA

Notes:

DRMO = Defense Reutilization and Marketing Office

IC = Institutional Control

IRFNA = Inhibited red-fuming nitric acid

LUC = Land Use Control

NA = No ROD for this site yet

RD = Remedial Design

ROD = Record of Decision

SEAD = Former Seneca Army Depot (site designation)

OU = operable unit

1) USACE. 2005. ROD The Ash Landfill Operable Unit. January.

2) USACE. 1999. ROD Former Open Burning (OB) Grounds Site. January.

3) USACE. 2004. ROD The Fire Training and Demonstration Pad (SEAD 25) and the Fire Training Pit and Area (SEAD 26). September.

4) USACE. 2006. ROD The Abandoned Deactivation Furnace (SEAD-16) and the Active Deactivation Furnace (SEAD-17). March.

5) USACE. 2015. ROD The Radioactive Waste Burial Sites (SEAD-12) and the Mixed Waste Storage Facility (SEAD-72). March.

6) USACE. 2009. ROD for the fill area west of Building 135 (SEAD-59) and the Alleged Paint Disposal Area (SEAD-71). March.

7) USACE. 2008. ROD for the Munitions Washout Facility (SEAD-4) and the Building 2079 Boiler Blowdown Pit (SEAD-38). August.

8) USACE. 2009. ROD for the Old Construction Debris Landfill (SEAD-11). September.

9) USACE. 2004. Decision Document, Mini Risk Assessment, SEAD-13, IRFNA Disposal Area. July.

10) USACE. 2003. ROD for Twenty No Action SWMUs (SEADs 7, 9, 10, 18, 19, 20, 21, 22, 33, 35, 36, 37, 42, 47, 49, 51, 53, 55, 65, and 68) and Eight No Further Action SWMUs (SEADs 28, 29, 30, 31, 32, 34, 60, and 61). September.

11) USACE. 2007. ROD for Seventeen SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E). March.

12) USACE. 2002. Decision Document–- Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B. May.

13) USACE. 2017. ROD SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007-R-01 (Seneca AD Munitions Response Sites) and SEAD-70. March.

14) USACE. 2004d. ROD for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas. September.

15) USACE. 2009c. ROD for Five Former SWMUs SEAD-1, 2, 5, 24, & 48. April.

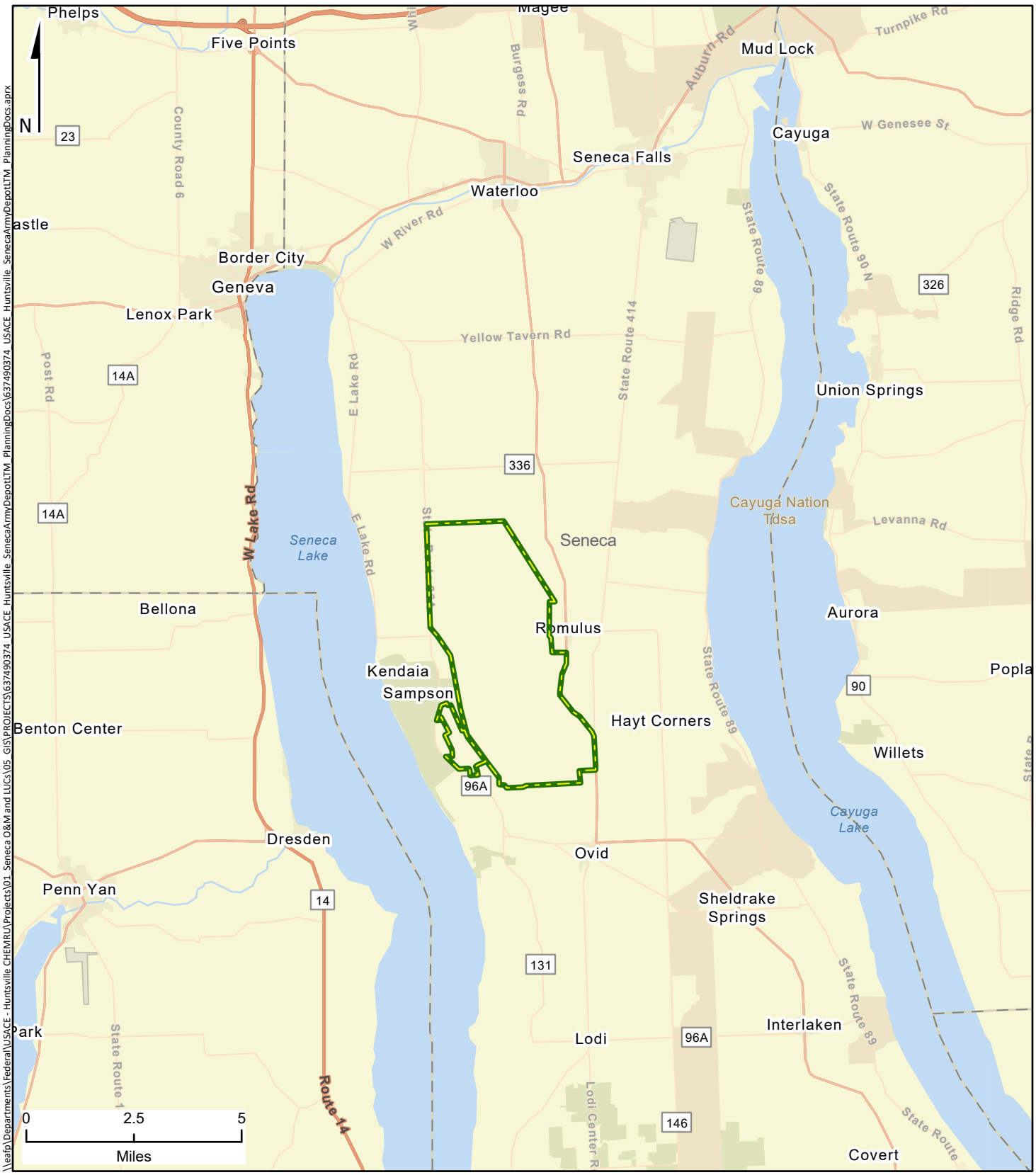
16) USACE. 2005b. ROD No Further Action SWMUs (SEAD-50/54). September.

17) USACE. 2008. ROD for the Defense Reutilization and Marketing Office Yard (SEAD-121C) and the Rumored Cosmoline Oil Disposal Area (SEAD-121I). June.

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Figures

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Legend

Former Depot Boundary

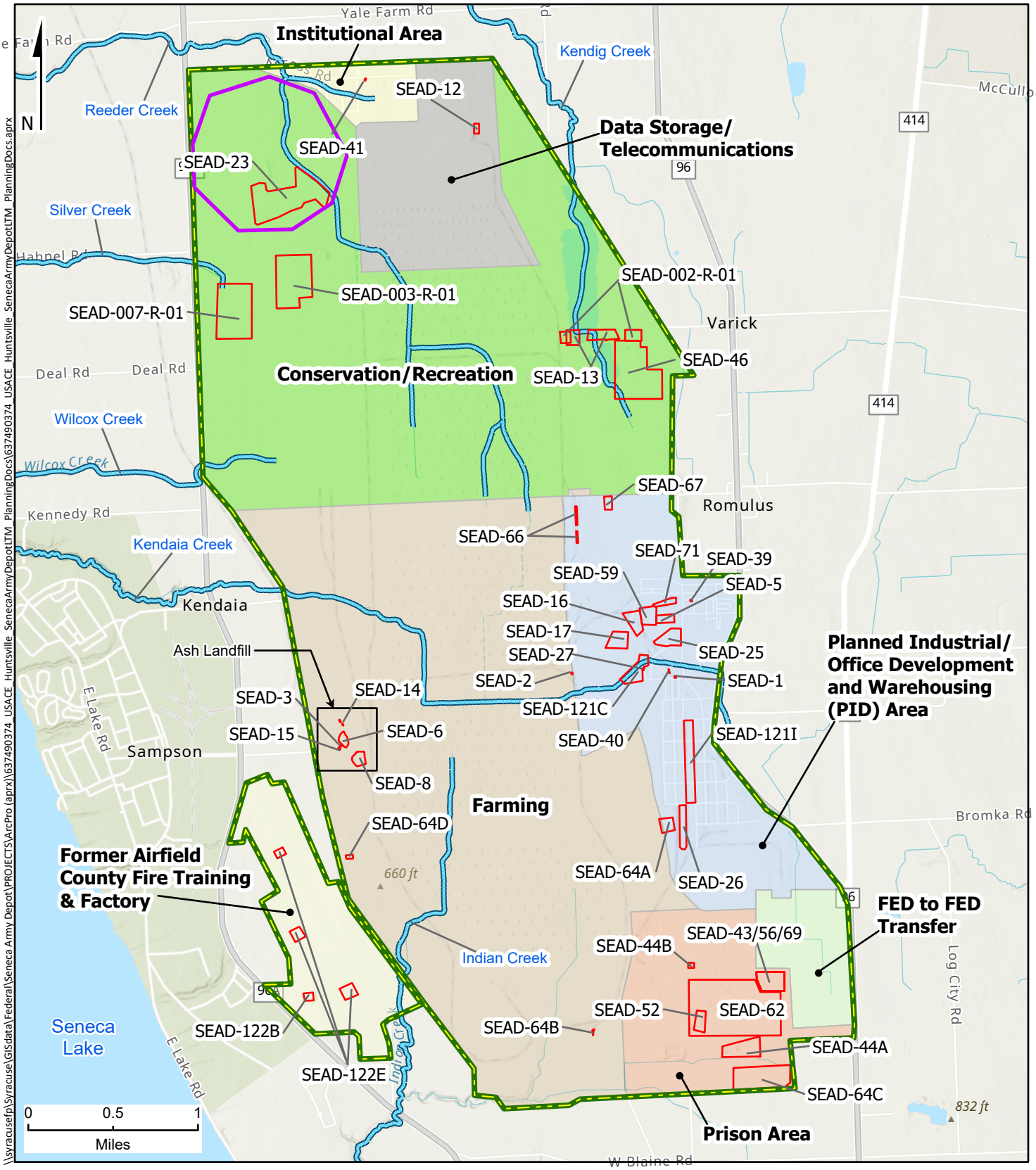
Figure 1

Site Location
Former Seneca Army Depot
Romulus, New York

Map Date:1/4/2023 9:21 AM

Projection: NAD 1983 2011 StatePlane
New York Central FIPS 3102 Ft US

\\eafp\Departments\Federal\USACE - Huntsville CHEMRU\Projects\01 Seneca O&M and LUCs\05 GIS\PROJECTS\637490374 USACE Huntsville SenecaArmyDepotLTM PlanningDocs\637490374 USACE Huntsville SenecaArmyDepotLTM PlanningDocs.aprx



Legend

- Former Depot Boundary
- SEAD Sites
- ODG Boundary
- Drainage

Figure 2
AOC Locations
Seneca Army Depot (SEAD)
Romulus, Seneca County, New York

Map Date:7/29/2025 2:34 PM

Projection: NAD 1983 2011 StatePlane
New York Central FIPS 3102 Ft US

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Appendix A

SEAD-1 Hazardous Waste Container Storage Facility (Building 307)

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APPENDIX A: SEAD-1 HAZARDOUS WASTE CONTAINER STORAGE FACILITY (BUILDING 307)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-1 (Building 307, the former Hazardous Waste Container Storage Facility) is located approximately 3,500 feet southwest of SEADs main entrance off State Route 96. Building 307 was constructed in 1981 and was used for temporary storage of containerized hazardous waste prior to their shipment offsite for disposal. During Building 307's active life, the ground surrounding the building was kept clear of vegetation.

Hazardous waste stored at SEAD-1 included spent solvents; still bottoms; sludge from oil/grease separations; cleaning compounds; paper filters; waste polychlorinated biphenyls (PCBs); and spent battery acids. The storage of hazardous waste in Building 307 was subject to regulations promulgated under RCRA, 42 U.S. Code (U.S.C.) §§6901- 63992k (USACE 2009a).

Initial Response

On 30 December 1991 USACE submitted a RCRA Part A and Part B Permit Application for SEAD that included storage operations at Building 307. The USACE permit application was not processed or approved, and operations performed at Building 307 continued under Interim Status until September 2005 when NYSDEC accepted USACE Closure Certificate for SEAD-1. A RCRA Closure was implemented and completed for Building 307 (SEAD-1). The NYSDEC approved the RCRA Closure of the building in September of 2005 and indicated that the existing building should only be used for industrial operations in the future. However, the NYSDEC deferred comments or determination on the acceptability of the soil located outside of the building to the CERCLA program.

Basis for Taking Action

Due to no risk assessment evaluation of unrestricted use and exposure for soil and potential risk to groundwater identified for the whole PID Area, an action was required at SEAD-1 to ensure land use remains protective of site users. SEAD-1 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas. The potential future hazards or risks identified at SEAD-1 are either suitable for the defined use or associated with compounds that are present at concentrations that are equal to or less than naturally occurring levels.

Contaminants of Concern

A review of soil sample results indicated that 66 chemicals were detected in one or more of the individual soil samples characterized at SEAD-1. Information and data presented in the ROD (USACE 2009a) summarized that hazardous constituents are present in the soil at SEAD-1 at levels that exceeded state guidance values and thus may pose a threat to selected future populations (e.g., future residents) that could use the land.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-1 there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors except for the construction worker (HI=1.56) are less than 1. The results of the risk assessment performed using the maximum detected concentrations for contaminants in soil and the reasonable maximum exposure scenario indicate that the cancer risks calculated at SEAD-1 for all receptors (i.e., industrial worker, construction worker, and adolescent trespasser) are 1×10^{-6} or less, which is consistent with EPA guidelines. Aluminum, iron, manganese, vanadium, and zinc in soil contribute significantly to the construction worker's elevated HI.

The risk assessment was recalculated using recommended Upper Confidence Limit (UCL) values in place of maximum concentrations as the Exposure Point Concentrations (EPCs) for aluminum, iron, manganese, vanadium, and zinc, and maximum concentrations for all of the other identified COCs. The results of this recalculation indicated that the estimated cancer risks for all potential future human receptors at SEAD-1 were consistent with, and less than EPA's preferred upper limits, and that the HIs for the industrial worker and adolescent trespasser were below 1. The construction workers' HI was reduced to 1.08. The risk assessment did not evaluate a residential (or unrestricted) exposure scenario.

An ecological risk assessment was not performed due to lack of suitable habitat.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Five Former Solid Waste Management Units (SWMUs), SEAD-1 (Hazardous Waste Container Storage Facility), SEAD-2 (PCB Transformer Storage Facility), SEAD-5 (Sewage Sludge Waste Piles), SEAD-24 (Abandoned Powder Burn Pit) and SEAD-48 (Row E0800 Pitchblende Storage Igloos)* (USACE 2009a) requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE are attained within the AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 4 to the SEAD LUC RD added SEADs 1, 2, 5, 16, 17, 59, 71, 121C and 121I in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehouse Area including properties that had been previously retained (including SEAD-1) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-1 is presented in **Table A.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-1 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehousing Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table A.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York State's GA groundwater standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table A.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table A.3.2**).

Table A.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-1	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table A.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-1	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025 and 2026.	NA
SEAD-1	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values to determine if UU/UE conditions can be met in soil at SEAD-1.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-1	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-1.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

Notes:
NA = not applicable/available

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-1 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-1.

- No access to or use of groundwater was observed at SEAD-1.

Interviews

Since SEAD-1 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-1.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial action section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD-1 within the PID/Warehousing Area have been completed and documented. No continuing active remediation is required in the PID/Warehousing Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-1 is currently protective of human health and the environment because:

- An LUC that prevents access to and use of groundwater within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored, and reported on periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-1. SEAD-1 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2009a). LUCs were placed on the site because the risk assessment did not evaluate an unrestricted use and exposure scenario. Groundwater was not evaluated as part of the SEAD-1 risk assessment; however, groundwater contamination is assumed across the PID/Warehouse Area. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC Soil Cleanup Objectives for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-1 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

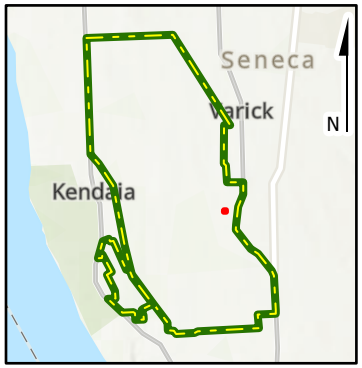
The remedy implemented for SEAD-1 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log







Legend

Former Depot Boundary

Photo Viewing Direction

1-1

SEAD-1
2026 FYR/LUC Inspection - Photo Log
Former Seneca Army Depot Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 1	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Appendix B

SEAD-2: PCB Transformer Storage Facility (Building 301)

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APPENDIX B: SEAD-2: PCB TRANSFORMER STORAGE FACILITY (BUILDLING 301)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-2, Building 301, is located in the east-central portion of SEAD, roughly 6,000 feet west, southwest of SEAD's main entrance off State Route 96. The building is located on the eastern side of Fayette Road, which separates the PID/Warehousing Area from the former munitions igloo storage area, which occupies the inner core of the SEAD.

Building 301 was originally constructed in 1942. It was upgraded in 1986 to meet hazardous waste storage requirements required by RCRA. The exterior of Building 301 measures approximately 35 feet 4 inches long by 23 feet 4 inches wide. The structure is partially bounded on its east and west sides, and completely on its north side, by a raised concrete loading dock, and access ramp and stairway assembly. Building 301 was used as a PCB transformer storage facility beginning in 1980 and continuing until SEAD closed in 2000.

Initial Response

A RCRA Closure was implemented and completed for Building 301 (SEAD-2). The NYSDEC approved the RCRA closure of the building in September of 2005, and indicated that the existing building should only be used for industrial operations in the future. However, the NYSDEC deferred comment or determination on the acceptability of the soils located outside the building to the CERCLA program.

Basis for Taking Action

Due to no risk assessment evaluation of unrestricted use and exposure for soil and potential risk to groundwater identified for the whole PID Area, an action was required at SEAD-2 to ensure land use remains protective of site users. SEAD-2 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas. The potential future hazards or risks identified at SEAD-2 are either suitable for the defined use, or associated with compounds that are present at concentrations that are equal to or less than naturally occurring levels.

Contaminants of Concern

Information and data presented in the ROD (USACE 2009a) summarized that hazardous constituents are present in the soil at SEAD-2 at levels that exceeded state guidance values and thus, may pose a threat to selected future populations (e.g., future residents) that could use the land. A review of the soil sample results for SEAD-2 indicated that 64 chemicals were detected in one or more of the individual soil samples characterized, and 20 were found in individual samples at concentrations that exceeded New York's Unrestricted Use soil cleanup objective (SCO) values. However, comparisons between 95 percent UCL concentrations and their SCO values indicated that only four compounds were found at concentrations greater than New York's

Unrestricted Use SCOs, while six compounds were found at a 95 percent UCL concentration in excess of the respective EPA Industrial Soil Regional Screening Level (RSL) value.

Human Health and Ecological Risk Assessment

The human health risk assessment evaluated reasonable anticipated exposure scenarios, which included industrial workers, construction workers, and adolescent trespassers. Residential land use was not evaluated in the risk assessment. The risk assessment concluded that at SEAD-2 the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for construction workers and adolescent trespassers but exceeded the range for industrial workers (5×10^{-4}). The calculated non-cancer HI for industrial workers and the adolescent trespasser are less than 1. The HI computed for the construction worker was documented as 1.48 in the ROD. The human health risk assessment was initially conducted using the maximum observed concentration as the EPC; subsequent risk calculations used the 95 percent UCL values for selected metal COCs.

The risk assessment based on a reasonable maximum exposure (RME) scenario and maximum detected concentrations indicated that non-cancer risks for the industrial worker and the adolescent trespasser were less than 1. The HI computed for the construction worker was 1.48. This HI was driven by the ingestion of soil and the inhalation of dusts containing metals. The predominant contributing metal is manganese, followed by iron, arsenic, aluminum, and vanadium. Data indicated that each of these metals, exclusive of arsenic, was found at concentrations that are less than State cleanup guidance values. The construction worker's HI decreased to 0.9 when the 95 percent UCL values for aluminum, arsenic, iron, manganese, and vanadium were substituted for the maximum detected levels. Note that EPA Risk Assessment Guidance indicates that an HI should only be reported to 1 significant figure. Following the EPA guidance this HI would be 1.

The cancer risk calculated at SEAD-2 for the construction worker and adolescent trespasser were found to be within the EPA's recommended risk management range (1×10^{-4} to 1×10^{-6}) based on the maximum detected concentration of the COCs and a RME exposure scenario. The cancer risk identified for the industrial worker was 5×10^{-4}, which exceeds the EPA's recommended range. The identified cancer risk for the industrial worker results were primarily due to dermal contact with, and ingestion of soil containing carcinogenic polycyclic aromatic hydrocarbons (cPAHs). The risk assessment and the conclusions of the AOC investigations were reviewed and approved by the EPA.

An ecological risk assessment was not performed due to lack of suitable habitat.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Five Former Solid Waste Management Units (SWMUs), SEAD-1 (Hazardous Waste Container Storage Facility), SEAD-2 (PCB Transformer Storage Facility), SEAD 5 (Sewage Sludge Waste Piles), SEAD-24 (Abandoned Powder Burn Pit) and SEAD-48 (Row*

E0800 Pitchblende Storage Igloos) (USACE 2009a) requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained within the AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 4 to the SEAD LUC RD added SEADs 1, 2, 5, 16, 17, 59, 71, 121C and 121I in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area, including properties that had been previously retained (including SEAD-2) by USACE in 2008, was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-2 is presented in **Table B.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-2, as part of the "PID Retained Parcels," was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehousing Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the Five-Year Review (FYR) and on an annual basis.

Table B.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York States GA groundwater standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table B.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table B.3.2**).

Table B.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-2	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Table B.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-2	NA	Continuing the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	NA
SEAD-2	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values to determine if UU/UE conditions can be met in soil at SEAD-2.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-2	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-2.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-2 was inspected 2 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-2.
- No access to or use of groundwater were observed at SEAD-2.

Interviews

Since SEAD-2 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-2.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for SEAD-2 within the PID/Warehousing Area have been completed and documented. No continuing active remediation is required in the PID/Warehousing Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit, all remedies are functioning as intended by the decision documents.

The remedy implemented at the SEAD-2 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the AOCs within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored, and reported upon periodically; and

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-2. SEAD-2 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2009a). LUCs were placed on the site because the risk assessment did not evaluate an unrestricted use and exposure scenario. Groundwater was

not evaluated as part of the SEAD-2 risk assessment; however, groundwater contamination is assumed across the PID/Warehouse Area. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-2 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-2 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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Attachment 1

Photographic Log



2-1





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-2
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 2	**Date of Inspection:**	02-02-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No groundwater use or access.

Observations:

Current Land Use

Vacant Building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix C

SEAD-5 Sewage Sludge Waste Piles

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APPENDIX C: SEAD-5 SEWAGE SLUDGE WASTE PILES

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-5 is located in the east-central portion of SEAD, approximately 3,000 feet west-southwest of SEAD's main entrance off State Route 96. SEAD-5 encompasses an area measuring approximately 150 feet by 250 feet in size. Between 1980 and roughly June 1992, sewage sludge from two Army wastewater treatment plants was stockpiled at this AOC. This area was also used as a location where SEAD's Department of Public Works (DPW) type storage and staging area for heavy equipment, materials and supplies was located.

Initial Response

The historical sewage sludge waste piles were removed from SEAD-5, and disposed at off-site landfills, in accordance with prevailing environmental requirements. A time-critical removal action (TCRA) was performed at SEAD-5 between 2003 and 2006 to address hazardous substance contamination that remained in soil underlying and surrounding the location of the historical sludge piles.

Basis for Taking Action

Due to human health risk in soil and groundwater an action was required at SEAD-5 to ensure land use remains protective of site users. SEAD-5 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehousing areas.

Contaminants of Concern

Data presented in the ROD (USACE 2009a) for SEAD-5 summarized that hazardous substances and constituents were present at levels that exceed federal and state soil guidance values and at levels that pose potential risks to future industrial and commercial users or occupants of the land.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-5 the human health cancer risks were less than the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for construction workers and adolescent trespassers. The calculated cancer risk for the industrial worker was slightly above the EPA's recommended range at a level of 1.3×10^{-4}. The calculated non-cancer HI for the industrial worker, construction worker, and the adolescent trespasser are all less than 1.0.

The human health risk assessment was computed using the 95th UCL of the mean as the EPC for each of the COCs. The elevated RME cancer risk was largely driven by concentrations of a single hazardous substance (benzo[a]pyrene) that was found at a few isolated, non-contiguous locations within the soil at the AOC. These elevated concentrations may be associated with

asphalt pieces that have become intermixed with the soil at the AOC due to its historical use as a DPW-type storage and staging area (USACE 1995b, 2009a).

An ecological risk assessment was not performed for SEAD-5.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Five Former Solid Waste Management Units (SWMUs), SEAD 1 (Hazardous Waste Container Storage Facility), SEAD 2 (PCB Transformer Storage Facility), SEAD 5 (Sewage Sludge Waste Piles), SEAD 24 (Abandoned Powder Burn Pit) and SEAD 48 (Row E0800 Pitchblende Storage Igloos)"* (USACE 2009a) requires the establishment of ICs. The elements that composed the remedy at SEAD-5 included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained within the AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

- Covering of contaminated soils (including those originating at SEADs 59 and 71) with at least one foot of clean fill that meets New York's Restricted Commercial Use SCO.

- Placing demarcation fabric (e.g., colored "snow" or safety fence) between the contaminated soil and the clean fill.

- Establishing, maintaining, monitoring, and reporting on a third LUC that prohibits unauthorized excavations or activities that might compromise the integrity of the engineered cover.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 4 to the SEAD LUC RD added SEADs 1, 2, 5, 16, 17, 59, 71, 121C, and 121I in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-5) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-5 is presented in **Table C.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-5 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed

for the PID/Warehousing Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the Five-Year Review (FYR) and on an annual basis.

Table C.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York States GA ground water Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
Subsurface	Yes	Yes	SEAD-5	Prohibit unauthorized excavations or activities that might compromise the integrity of the engineered cover. (Note that the environmental easement prohibits any excavation within SEAD-5 without coordination with USACE and EPA)	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning

In June through July 2009, a soil cover was constructed to intersect a portion of SEAD-5 where analytical results from soil samples indicated that elevated levels of certain hazardous substances were present at concentrations that posed potential human health risks to future industrial occupants and users of the land. The initial cover layer soil consisted of approximately 5,620 cubic yards (cy) of SEAD-59/71 stockpile soil. This soil covered approximately 1.57 acres of land. A layer of demarcation fabric was placed atop the initial layer of spread stockpile soil to delineate the lateral extent of the covered soil. One (1) foot of borrow material of quality that

meets Restricted Commercial Use SCOs defined by the NYSDEC was then placed as a protective barrier layer (USACE 2009a).

The CCR for the Former Sewage Sludge Waste Piles (USACE 2010) provided record documentation of the completed remedial action construction activities and that accessible soil remaining in the area of the former sludge pile locations met the remedial goals defined in the ROD for AOC. The ROD indicates that the unauthorized excavation LUC for SEAD-5 is implemented only at that location where the protective cover is established over SEAD-5 soils. The environmental easement requires coordination with USACE and EPA for any excavation within SEAD-5 property.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table C.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table C.3.2**).

Table C.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-5	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

123 **Table C.3.2 Status of Recommendations from the 2021 FYR**

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-5	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	NA
SEAD-5	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values to determine if UU/UE conditions can be met in soil at SEAD-5.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
	NA	Collect new groundwater samples and perform a site-specific risk assessment to determine if Class GA standards can be met in groundwater at SEAD-5.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

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FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-5 was inspected 4 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-5.
- No access to or use of groundwater was observed at SEAD-5.
- The cover is in acceptable condition with no evidence of unauthorized excavation.

Interviews

Since SEAD-5 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-5.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for SEAD-5 within the PID/Warehousing Area have been completed and documented. No continuing active remediation is required in the PID/Warehousing Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at the SEAD-5 is currently protective of human health and the environment because:

- Contaminated soils were covered with at least 1 foot of clean fill, and demarcation fabric was placed between the contaminated soil and clean fill.

- An LUC that prevents access to, and use of, groundwater within the AOCs within the PID/Warehousing Area of the former Depot has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A third LUC that prohibits unauthorized excavations or activities that might compromise the integrity of the engineered cover at SEAD-5 has been implemented and is currently being maintained, monitored, and reported periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-5. SEAD-5 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. The changes described in this section are not expected to alter the protectiveness of the remedy because LUCs are in place that eliminate soil exposure pathways that were a potential risk concern and prohibit the use of groundwater.

Potential risk concerns were identified for industrial worker exposure to soil primarily from benzo(a)pyrene. Cleanup levels were not identified in the ROD. An engineered cover was placed on the site that restricts exposure to soil, and an LUC is in place to restrict excavation within the engineered cover area. UU/UE were not evaluated in the risk assessment. LUCs have been implemented for the site that prohibit land use at the site for unlimited use and exposures. Potential exposure pathways that may be a risk concern are considered incomplete.

Groundwater was not evaluated as part of the SEAD-5 risk assessment; however, groundwater contamination is assumed across the PID/Warehouse Area. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure

pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAOs and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-5 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-5, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-5 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log

5-3

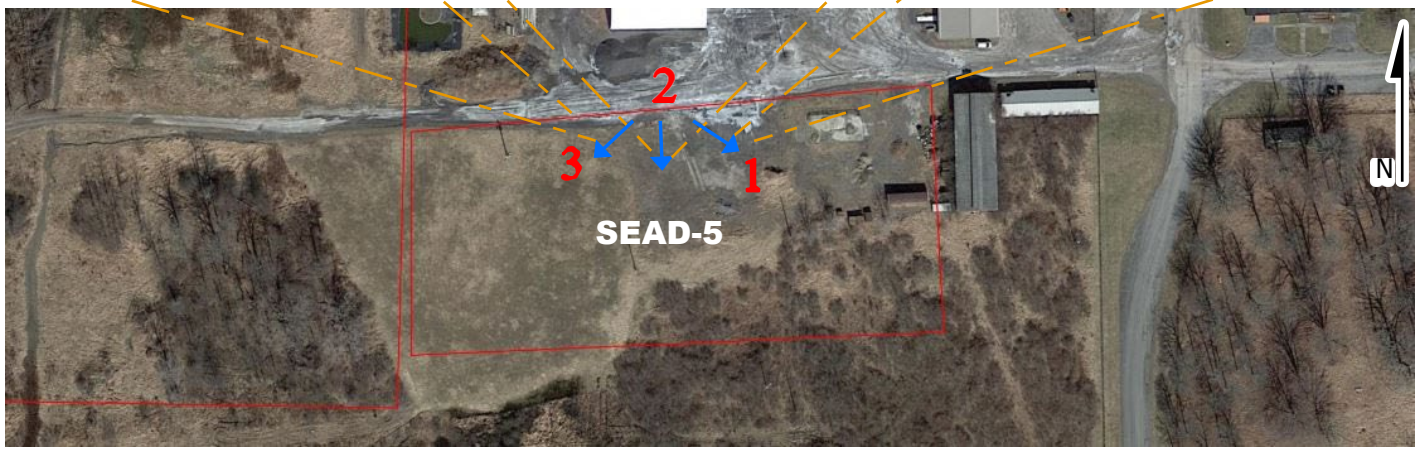


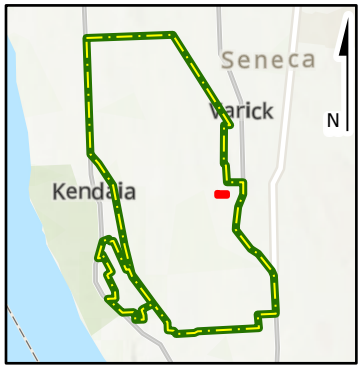
5-2



5-1







Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-5
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

\\SYRACUSEFP\Syracuse\GISdata\Federal\Seneca_Army_Depot\PROJECTS\ArcPro_(aprx)\637490374_USACE_Huntsville_SenecaArmyDepot_LUCInspections\637490374_USACE_Huntsville_SenecaArmyDepot_LUCInspections - Copy.aprx

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 5	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix D

SEAD-16: The Former Abandoned Deactivation Furnace and SEAD-17: The Former Active Deactivation Furnace

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APPENDIX D: SEAD-16: THE FORMER ABANDONED DEACTIVATION FURNACE AND SEAD-17: THE FORMER ACTIVE DEACTIVATION FURNACE

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The former Abandoned Deactivation Furnace (SEAD-16) is located in the east-central portion of SEAD. SEAD-16 consists of 2.6 acres of fenced land with grasslands in the north, east, and west, a former storage area for empty boxes and wooden debris, and an unpaved roadway in the south. Also previously located onsite was the building that housed the deactivation furnace, a smaller abandoned building known as the Process Support Building, two sets of SEAD railroad tracks, and some utilities. Two underground storage tanks were removed from SEAD-16 and documented in a Final Closure Report for the Underground Storage Tank Removal (USACE 1994).

SEAD-16 was used for the demilitarization of various small arms munitions. The process of deactivation of munitions involved heating the munitions within a rotating steel kiln, which caused the munitions to detonate. The byproducts produced during this detonation were then swept out of the kiln through the stack. SEAD-16 has been inactive and abandoned since the 1960s.

The former Active Deactivation Furnace (SEAD-17) is located in the east-central portion of SEAD. SEAD-17 consisted of a deactivation furnace building that was surrounded by a crushed shale road. Beyond the perimeter of the crushed shale road was grassland. Two small sheds are located in the eastern portion of SEAD-17, and there is vehicular access to SEAD-17 from an unpaved road to the north.

SEAD-17 was constructed to replace the operation of SEAD-16 and was also used for the demilitarization of various small arms munitions. The process of deactivation of munitions involved heating the munitions within a rotating steel kiln, which caused the munitions to detonate. The byproducts produced during this detonation were then swept out of the kiln through the stack. SEAD-17 operated prior to the establishment of RCRA and then under RCRA Interim Status until the early 1990s. During the 1990s, the Army upgraded the incinerator; however, the upgrades did not meet incinerator requirements for temperature and residence time, and the incinerator was not subsequently operated to dispose of hazardous materials. Henceforth, SEAD 17 was closed under RCRA in approximately 2005 (USACE 2006f).

Initial Response

SEAD-16 has been inactive and abandoned since the 1960s. SEAD-17 was constructed to replace the operation of the deactivation furnace at SEAD-16. However, SEAD-17 has been inactive since 1989 because of RCRA permitting issues.

All facilities that engage in the treatment, storage, and/or disposal of hazardous waste are required to obtain a RCRA permit. The deactivation furnace at SEAD-17, which operated until 1989, was used to incinerate and deactivate or destroy small munitions and other materials associated with

munitions or explosives. With the enactment of RCRA in 1976, waste explosives were classified as hazardous waste, and thus the deactivation unit was classified as a hazardous waste treatment process. Because of the historical ongoing operations at the deactivation furnace at SEAD-17, the furnace at SEAD-17 was subject to RCRA permitting and is subject to RCRA closure requirements. The former deactivation furnace at SEAD-16 was not subject to RCRA requirements since it was not active subsequent to the enactment of RCRA in 1976. The State of New York has been delegated to the RCRA program by the EPA for oversight and closure of the RCRA unit.

SEAD-17 consisted of two distinct units: (1) contamination in the surrounding soils and groundwater, and (2) contamination of the deactivation furnace, building, and equipment. Contamination in the soil and groundwater is being addressed under CERCLA, and remediation of these media was covered in the ROD (USACE 2006f).

The Federal Facilities Agreement (FFA) details the relationship between CERCLA and RCRA, and under the FFA, remediation of releases under CERCLA "obviate the need for further corrective actions under RCRA for those releases (i.e. no further corrective action shall be required) and RCRA shall be considered an applicable or relevant and appropriate requirement." Therefore, in performing the remedy outlined in the ROD in a manner approved by EPA and NYSDEC, the substantive requirements of RCRA would be met for the soil and groundwater at SEAD-17.

The deactivation furnace, building, and equipment at SEAD-17 have been addressed during RCRA interim closure actions as outlined below.

The following summarizes the regulatory history of the deactivation furnace at SEAD-17:

- 1962-1980 – Deactivation Furnace operated to destroy small arms ammunition.

- 1976 – RCRA enacted; legislation allowed owners and operators of hazardous waste TSDFs that were in existence as of 19 November 1980, to operate under Interim Status until their RCRA permit was issued or their request was denied.

- 1980-1989 – USACE submitted a Title 6 New York Code of Rules and Regulations Part 373 Part A and a Part B permit application to permit the Seneca Army Depot as a TSDF. The Deactivation Furnace at SEAD-17 was listed as a hazardous waste incinerator for small arms ammunition. As was customary at the time, all facilities that submitted Part A permit applications were allowed to continue to operate under Interim Status.

- 1980-1989 – Deactivation Furnace continued to operate under Interim Status.

- 1989 – Deactivation Furnace was shutdown to allow for the addition of a new air pollution control device system. As part of the upgrade, NYSDEC required that the furnace be closed in accordance with RCRA Interim Status requirements.

- 6 November 1989 – RCRA Interim Closure Plan for the deactivation furnace was approved by NYSDEC.

- 1989-1991 - USACE undertook interim closure actions at SEAD-17, which included the following:

  — Removal of all hazardous waste residues, containers, and removal of the baghouse filters, and dust.

  — Sampled the building, equipment, drains, and soils and subsequent decontamination and removal of releases.

- 21 August 1991 – Interim Closure of the Deactivation Furnace was approved by NYSDEC in a letter, pending an independent certification by NYS Professional Engineer. The letter noted the following:

  — Interim closure measures were completed and accepted for equipment, drains, walls, and concrete.

  — The soil sampling determined contamination existed in and around the facility because of past operations. USACE, EPA, and NYSDEC agreed to address this contamination as an AOC under the FFA. Because of the potential of recontamination of the building, the fact that contamination in soil will remain, and wipe samples of walls and floors failed to meet the criteria that was set, clean closure could not be achieved.

- 3 March 1992 – Independent certification by NYS Professional Engineer submitted to NYSDEC, on behalf of USACE, stated that the deactivation furnace was "dirty closed."

- 1995 – Base closure was announced; USACE withdrew its RCRA permit application.

- 1989-2005 – The furnace was not used for waste, test material was processed for the upgrade equipment prove-out, and a pilot study was performed to evaluate its use as a Low Temperature Thermal Desorption system for lightly contaminated soil, which was not considered hazardous.

At SEAD-16, debris were removed from inside Building S-311 (the Abandoned Deactivation Furnace), Building 366, and both of these buildings were demolished and removed from the site due to safety concerns. At SEAD-17, Building 367, the Deactivation Furnace assembly and the supporting air pollution control device system were demolished. The detailed discussion of the building demolition actions can be found in the Building Demolition and Cleaning Report (USACE 2008a).

Basis for Taking Action

Because of COC in soil and groundwater, an action was required at SEAD-16/17 to ensure land use remains protective of site users. SEAD-16/17 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas. The potential future hazards or risks identified at SEAD-16/17 are either suitable for the defined use or associated with compounds that are present at concentrations that are equal to or less than naturally occurring levels.

Contaminants of Concern

The primary COC at SEAD-16 were four metals (i.e., arsenic, copper, lead, and zinc), polycyclic aromatic hydrocarbons (PAHs), and nitroaromatics. The most impacted soils were those adjacent to the abandoned deactivation furnace. Many of these compounds were present in concentrations that exceeded their respective NYSDEC guidelines. The COC are believed to have been released to the environment during the former deactivation furnace's period of operation (approximately 1945 to the mid-1960s). Seven metals (i.e., aluminum, antimony, iron, lead, manganese, sodium, and thallium) were detected in groundwater samples at concentrations that exceeded the NYSDEC ambient water quality standards (AWQS) Class GA groundwater quality standards or Federal Maximum Contaminant Level (MCL) standards. Additional sampling of the groundwater indicated that elevated thallium concentrations may have been the result of high turbidity in the samples. PAHs, pesticides, antimony, cadmium, copper, lead, and nickel were found at elevated concentrations in all of the drainage ditches that were investigated at SEAD-16 (USACE 1999a).

At SEAD-17, the primary COC were six metals (i.e., antimony, arsenic, copper, lead, mercury, and zinc), PAHs and pesticide compounds. All of these compounds were likely to have been released to the environment during the active deactivation furnace's period of operation (approximately 1962 to 1989). Low concentrations of semivolatile organic compounds (SVOCs) and metals were detected in groundwater. Those that exceeded their respective MCL criteria were either essential nutrients or a result of high turbidity in the samples. No volatile organic compounds (VOCs), pesticides, PCBs, or nitroaromatics were detected in the samples (USACE 1999a).

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-16, the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for all receptors except the future industrial worker (5×10^{-3}). The calculated non-cancer HI for all receptors were greater than or equal to 1.0. The results of the baseline risk assessment at SEAD-16 indicated that the HI was above the EPA target of 1.0 for the future industrial worker (HI=20), future on-site construction worker (HI=1), future day care center child (HI=6), and future day care center worker (HI=2). The risk assessment was conducted using data collected during the RI.

The risk assessment concluded that at SEAD-17, the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for all receptors. The calculated

non-cancer HIs for all receptors except for the future day care center child (HI=1.0) were less than 1.0.

The reasonable maximum ecological exposure was also evaluated. The results of the ecological risk assessment presented in the RI report (USACE 1999a) concluded that there was negligible risk to the ecosystems of the SEAD-16 and SEAD-17 study areas. An ecological risk assessment was conducted to evaluate potential risk to deer, mouse, and the creek chub posed by the contaminants of potential concern (COPCs) detected in soils, surface water, and ditch sediment/soils. The quantitative ecological risk evaluation initially suggested that a possibility existed for the COPCs to present a small potential for environmental effects because of soil, surface water, and ditch sediment/soils at both SEAD-16 and SEAD-17. However, given the conservative nature of the assessment, the poor quality of the SEAD-16 and SEAD-17 habitat, and the future land use designation as industrial, it was not likely that SEAD-16 and SEAD-17 supported or would support a significant portion of the community of species that occupy the area surrounding and including these areas.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *The Final Record of Decision for the Abandoned Deactivation Furnace SEAD 16 and the Active Deactivation Furnace SEAD 17* (USACE 2006f) require the establishment of ICs. The elements that composed the remedy included:

- Conduct additional sampling as part of the pre-design sampling program to further delineate the areas of excavation
- Remove, test, and dispose of the SEAD-16 building debris offsite
- Excavate approximately 275 cy of ditch soil with lead concentrations greater than 1,250 milligrams per kilogram (mg/kg) until cleanup standards are achieved
- Excavate approximately 1,760 cy of surface soil to a depth of 1 foot at SEAD-16 with lead concentrations greater than 1,250 mg/kg, and PAH and metal concentrations greater than risk-based derived cleanup standards
- Excavate approximately 67 cy of subsurface soils to a depth of 2 to 3 feet at SEAD-16 (areas around SB16-2, SB16-4, and SB16–5) with lead concentrations greater than 1,250 mg/kg, and PAH and metal concentrations greater than risk-based derived cleanup standards
- Excavate approximately 2,590 cy of surface soils to a depth of 1 foot at SEAD-17 with lead concentrations greater than 1,250 mg/kg and metal concentrations greater than risk-based derived cleanup standards

- Stabilize soils from SEAD-16 and SEAD-17 and building debris from SEAD-16 exceeding the Toxicity Characteristic Leaching Procedure (TCLP) criteria in order to attain Land Disposal Restrictions

- Dispose of the excavated material in an off-site landfill

- Backfill the excavated areas with clean backfill

- Conduct groundwater monitoring at SEAD-16 and SEAD-17 until concentrations are below the GA criteria

- Remediating material potentially presenting an explosive hazard and munitions and explosives of concern to meet the Department of Defense Explosive Safety Board (DDESB) requirements for unrestricted use or to put into place land use restrictions as may be required by DDESB

- Submit a Completion Report following the remedial action

- Establish and maintain LUCs to:

  — Prevent access to or use of the groundwater until cleanup levels are met

  — Prevent residential housing, elementary and secondary schools, childcare facilities and playgrounds activities

- Complete a review of the selected remedy every 5 years (at minimum), in accordance with Section 121(c) of the CERCLA

To complete RCRA closure of the deactivation furnace at SEAD-17, USACE further decontaminated or demolished and disposed offsite the structures that failed to meet closure standards during the interim closure (i.e., concrete slabs and block walls).

Remedy Implementation

The CCR (USACE 2008c) for the Abandoned Deactivation Furnace (SEAD-16) and the Active Deactivation Furnace (SEAD-17) provides documentation of the removal action construction activities addressing contaminated soil, building debris, and groundwater completed at the two historical AOCs. The CCR provides documentation that all soil exceeding cleanup goals were removed and no further action is required for soil at the AOCs.

The selected remedy at SEAD-16 and SEAD-17 resulted in the removal of soil and groundwater as a pathway for potential receptors. At SEAD-16, approximately 2,100 cy of impacted soil were removed and disposed of at an off-site landfill. At SEAD-17, approximately 2,590 cy of lead impacted soil were removed and disposed of at an off-site landfill and the excavated areas were backfilled with clean backfill. Soil was excavated from both SEAD-16 and SEAD-17 until confirmatory soil samples collected from the sidewalls (when appropriate), the excavation floor,

and the perimeter yielded analytical results below site-specific cleanup standards established in the RD Work Plan (see below). The depth of excavation completed at SEAD-16 varied from approximately 1 to 3 feet below ground surface (bgs) and the excavation depth at SEAD-17 varied from approximately 1 to 2 feet bgs. Deeper excavations at SEAD-16 and SEAD-17, including excavation areas surrounding the railroad tracks, were backfilled with clean bank-run gravel. SEAD-16 and SEAD-17 were graded to promote positive drainage. The areas at SEAD-17 that were vegetated prior to the remedial action were seeded to restore the vegetation. SEAD-16 was not seeded since it was not previously vegetated.

SEAD-16/17 Soil Removal Cleanup Goals		
Analyte	**Cleanup Goal (mg/kg)**	**Goal Met?**
Antimony	41	Yes
Arsenic	21.5	Yes
Cadmium	60	Yes
Copper	10,000	Yes
Lead	1250	Yes
Mercury	5.7	Yes
Thallium	6.7	Yes
Zinc	10,000	Yes
cPAHs (BTE)*	10	Yes

Notes:

*cPAHs were only sampled at SEAD-16 and were compared to the Benzo(a)pyrene Toxicity Equivalence. NYSDEC. 2006. Remedial Program Soil Cleanup Objectives. 6 NYCRR Subpart 375-6. NYSDEC Restricted Use Soil Cleanup Objective for Industrial Use

Groundwater was monitored to ensure that soil contamination left onsite did not further degrade groundwater quality. SEAD-16 and SEAD-17 were placed under a LTM program for groundwater monitoring until concentrations are below the NYS Class GA groundwater quality standards (USACE 2006f, 2007c). LTM began in 2007 and is currently ongoing at SEAD-16 while LTM at SEAD-17 was discontinued following the last FYR (USACE 2021). Post-remediation groundwater sampling results indicate that groundwater has not been significantly impacted by site activities. Groundwater use restriction continues until groundwater constituent concentrations have been reduced to levels that allow for UU/UE. With EPA approval, once groundwater cleanup standards are achieved, the groundwater use restrictions may be eliminated.

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 4 to the SEAD LUC RD added SEADs 1, 2, 5, 16, 17, 59, 71, 121C and 121I in accordance with the SEAD LUC RD Supplementation provision. A summary of the ICs currently implemented at SEAD-16 and SEAD-17 is presented in **Table D.2.1** based on the data and risk presented in the ROD and the LUC RD.

An Environmental Easement for the PID/Warehouse Area including properties that had been previously retained (including SEAD-16 and SEAD-17) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011.

SEAD-16 and SEAD-17 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table D.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York States GA ground water Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table D.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table D.3.2**).

Table D.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-16 and SEAD-17	Protective	The remedy implemented for SEAD-16, SEAD-17, and the PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years. Additionally, SEAD-16 and SEAD-17 are located within the PID area, within which an environmental easement and deed restriction prohibit both residential use and the use of groundwater.

Table D.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-16 and SEAD-17	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	NA
SEAD-16 and SEAD-17	NA	Based on the current area-wide LUC prohibiting the use of groundwater within the PID/Warehouse Area (including SEAD-16/17), USACE recommends that sampling be performed every five years at SEAD-16 and that LTM be concluded at SEAD-17.	Completed	LTM is currently ongoing at SEAD-16 with the most recent sampling event conducted in July 2025. LTM at SEAD-17 has been discontinued.	NA
SEAD-16	NA	Abandon MW-16-7 consistent with NYSDEC regulations and install a replacement well prior to the 2024 sampling event.	Not completed	MW16-7 was not abandoned, and a replacement well was not installed. MW16-7 was sampled during the 2025 sampling event and appears to be functioning correctly.	

Notes:
NA = not applicable/available

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

An evaluation of all pre- and post-remedial action groundwater results from SEAD-16 provided in the 2025 SEAD-16 Sampling Report (USACE 2026a). Summaries of the 2025 groundwater monitoring results and exceedances are provided in Table 2 and Table 4 of the report. Concentration trends from the start of LTM to the 2025 sampling event are provided in Appendix D of the report.

Between 2007 and 2025, there were 10 LTM sampling events at SEAD-16, during which six metals have exceeded project action limits: antimony, iron, lead, manganese, sodium, and thallium. Thallium exceeded for the first time in 2025. Although iron concentrations typically exceed its action level, in the past three events, iron concentrations were similar to the action level. Iron is not expected to pose a risk beyond what is naturally found in local groundwater. Manganese concentrations are historically below its NYS Class GA standard (300 micrograms per liter [µg/L]). One exceedance (631 µg/L) of manganese was detected in well MW16-7 during Event 1. Sodium exceeded its screening criterion three times. Except for the maximum detected concentration (25,500 J µg/L, Year 3), all of the exceedances of iron have been below the SEAD background (4,476 µg/L).

The following conclusions were made in the 2025 SEAD-16 Sampling Report:

- Due to continued exceedance of metals in groundwater at the site, it is recommended to maintain the current sampling schedule with the next sampling event scheduled for 2030.

Site Inspection

SEAD-16 and SEAD-17 were inspected on 3 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**. Well inspections were also performed during groundwater sampling events, and a figure that shows the site features, including the monitoring wells, is contained in **Attachment 3**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-16/17.

- Observations of the monitoring wells at SEAD-16/17 indicate that the wells located on the site are in acceptable condition.

- The selected remedy is still protective of human health and the environment.

Interviews

Since SEAD-16/17 are uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-16/17.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LTM Reports, LUC RD, environmental easements, transfer deeds and the FYR site visit conducted on 3 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-16/17 currently protects human health and the environment because:

- Previously contaminated soils containing lead at concentrations in excess of 1250 mg/kg, and other metals and PAHs above risk-based derived cleanup standards at SEAD-16, have been excavated, stabilized to prevent potential leaching, and disposed at an off-site landfill.

- Previously contaminated soils containing lead at concentrations in excess of 1,250 mg/kg and other metals above risk-based derived cleanup standards at SEAD-17, have been excavated, stabilized to prevent potential leaching, and disposed at an off-site landfill.

- An unexploded ordnance technician witnessed the excavation of contaminated soil materials from SEAD-16 and SEAD-17, the dismantling of process equipment, and the cleaning of the basement of Building S-311 (former Abandoned Deactivation Furnace) to assess whether materials presenting potential explosive hazard (MPPEH) were present. No MPPEH was found in the excavated soil or debris removed during these operations, and the process equipment was safely dismantled and transported to the OB Grounds (SEAD-23) where it was heat treated to remove any propellant residues. Treated process equipment was subsequently disposed at an off-site landfill.

- LUCs that prohibit access to, and use of, groundwater and prevents residential housing, elementary or secondary schools, childcare facilities, or playground activities until cleanup standards have been met have been implemented and continue to be monitored by USACE.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-16/17. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy because LUCs are in place that prohibit the unrestricted use of both SEAD-16 and SEAD-17 and prohibit the use of groundwater.

Cleanup levels for COCs were compared to NYS SCO values contained in 6 NYCRR Part 375-6 Remedial Program SCO and EPA regional screening levels to assess changes in toxicity values on cleanup levels. **Table D.5.1** presents this comparison. All cleanup levels are below the NYSDEC restricted use SCOs, except cadmium and mercury. It is noted the restricted use SCOs also take into account child visitors. The planned future use for this area is industrial, office development, and/or warehouse areas, which would not involve child visitors. Additionally, LUCs implemented for this site restrict residential housing units, elementary or secondary schools, childcare facilities or playgrounds, which provides additional justification that child visitors for this site are unlikely. As a result, the EPA industrial soil RSLs provide a more appropriate indication of whether potential human health concerns would be associated with COCs at this site. Cleanup levels are below the EPA industrial soil regional screening levels (RSLs), except for arsenic and benzo(a)pyrene. For arsenic and benzo(a)pyrene, EPA RSLs are based upon cancer endpoints. The cleanup levels are less than an order of magnitude higher than the EPA RSLs, which confirms cancer risks would be within the EPA acceptable cancer risk range of 10^{-4} to 10^{-6}. This reveals that these cleanup levels are protective.

On 16 October 2025, EPA updated guidance for evaluating residential lead exposures at CERCLA and RCRA sites (EPA 2025). While SEAD-16 and SEAD-17 are not residential sites, the EPA revised lead guidance lowered the target blood-lead level from 10 µg/dL to 5 µg/dL when evaluating lead in soil. The change in the target blood-lead level also affects sites that include commercial or industrial worker receptors. To evaluate this change to the target blood-lead level, the lead cleanup level of 1,250 mg/kg was assessed in the EPA Adult Lead Methodology (ALM) (**Table D.5.2**). To achieve a specific level of protectiveness, the EPA has set to limit exposure to soil lead levels such that a typical (or hypothetical) child or population would have an estimated risk of no more than 5% of the population exceeding the target blood-lead level. The ALM reveals that 7.7% of the population exceeds the target blood-lead level of 5 micrograms per deciliter (µg/dL), which exceeds EPA's limit of 5% (**Table D.5.2**). However, the cleanup goal does not represent the soil lead concentrations that remained at the SEAD-16 and SEAD-17. The Construction Completion Report was reviewed to determine the average soil lead concentration from confirmation samples (USACE 2008c). For SEAD-16, the average soil lead concentration in confirmation samples was 439 mg/kg. For SEAD-17, the average soil lead concentration in confirmation samples was 411 mg/kg. These average soil lead concentrations are lower than the EPA industrial soil RSL, NYSDEC Restricted Use Commercial, and NYSDEC Restricted Use Industrial. Therefore, the soil removal based upon the soil lead cleanup level of 1,250 mg/kg is protective for commercial/industrial land use.

For groundwater, SEAD-16 is undergoing active LTM, the screening levels and cleanup levels are reviewed and updated in the Annual LTM report (USACE 2026a). In the latest report groundwater concentrations were compared against NYS Water Quality Standards, Class GA (6

460 CRR-NY 703.5) or, if not available, EPA RSLs (TR=1E-06, THQ=0.1, November 2024) for tap
461 water.
462
463 **Table D.5.1 Comparison of Cleanup Levels**

Chemicals of Concern Listed in ROD	Cleanup Levels in ROD	Current NYSDEC Soil Cleanup Objectives (Restricted Use Commercial)(1)	EPA Industrial Soil RSL(2)	Are the cleanup goals protective? (Y/N)
Benzo(a)pyrene	10	3.7	2.1	Y
Antimony	41	--	470	Y
Arsenic	21.5	16	3.0	Y
Cadmium	60	3.7	100	Y
Lead	1,250	1,000	800	--
Mercury	5.7	1.1	30	Y
Thallium	6.7	--	12	Y
Zinc	10,000	10,000	350,000	Y

464 Notes:
465 1) 6 CRR-NY 375-6.8 (b) Restricted Use Commercial Soil Cleanup Objectives; Updated 31 December
466 2025.
467 2) EPA Industrial Soil Regional Screening Levels (RSLs) based on a risk of 1E-06 or target HQ = 0.1;
468 November 2024.
469 "--" Indicates no criteria or not applicable
470 Units are in milligrams per kilogram (mg/kg)
471

Table D.5.2 Calculations of Blood Lead Concentrations (PbBs) and Risk in Nonresidential Areas, SEAD-16 and SEAD-17, U.S. EPA Technical Review Workgroup for Lead

Variable	Description of Variable	Units	GSDi and PbBo from Analysis of NHANES 2009-2014
PbS	Soil lead concentration	µg/g or ppm	1,250
$R_{fetal/maternal}$	Fetal/maternal PbB ratio	--	0.9
BKSF	Biokinetic Slope Factor	µg/dL per µg/day	0.4
GSD_i	Geometric standard deviation PbB	--	1.8
PbB_0	Baseline PbB	µg/dL	0.6
IR_S	Soil ingestion rate (including soil-derived indoor dust)	g/day	0.050
IR_{S+D}	Total ingestion rate of outdoor soil and indoor dust	g/day	--
W_S	Weighting factor; fraction of IR_{S+D} ingested as outdoor soil	--	--
K_{SD}	Mass fraction of soil in dust	--	--
$AF_{S, D}$	Absorption fraction (same for soil and dust)	--	0.12
$EF_{S, D}$	Exposure frequency (same for soil and dust)	days/yr	219
$AT_{S, D}$	Averaging time (same for soil and dust)	days/yr	365
PbB_{adult}	PbB of adult worker, geometric mean	µg/dL	2.4
$PbB_{fetal, 0.95}$	95th percentile PbB among fetuses of adult workers	µg/dL	5.7
PbB_t	Target PbB level of concern (e.g., 2-8 µg/dL)	µg/dL	**5.0**
$P(PbB_{fetal} > PbB_t)$	**Probability that fetal PbB exceeds target PbB, assuming lognormal distribution**	**%**	**7.7%**

Notes:
Version date: 6/14/2017
µg/dL = micrograms per deciliter
days/yr = days per year
g/day = grams per day
GSDi = Geometric standard deviation
PbBo = Baseline blood lead concentration
NHANES = National Health and Nutrition Examination Survey
ppm = part(s) per million

As a result, the cleanup levels and RAOs from earlier RODs are considered still valid. Since the standards are reviewed on an annual basis and updated as needed the cleanup standards remain protective of human health.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-16/17 and the PID/Warehousing Areas. There have been no changes in the

physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEADs-16/17, and the sites were recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-16, SEAD-17, and PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years. Additionally, SEAD-16 and SEAD-17 are located within the PID area, within which an environmental easement and deed restriction prohibits both residential use and the use of groundwater.

508

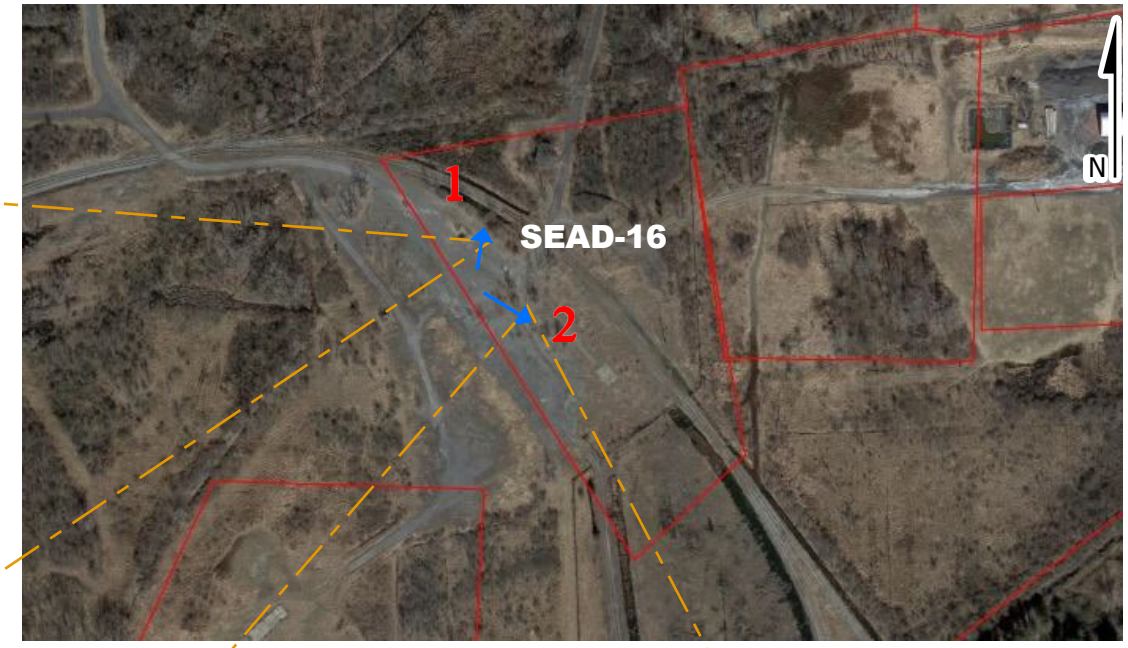
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Attachment 1

Photographic Log

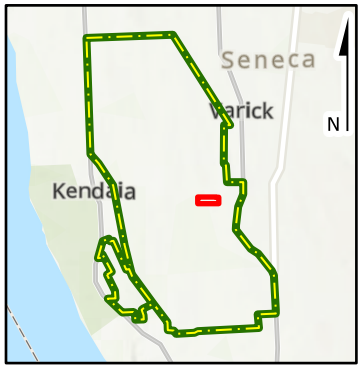


16-1





16-2



Legend

Former Depot Boundary

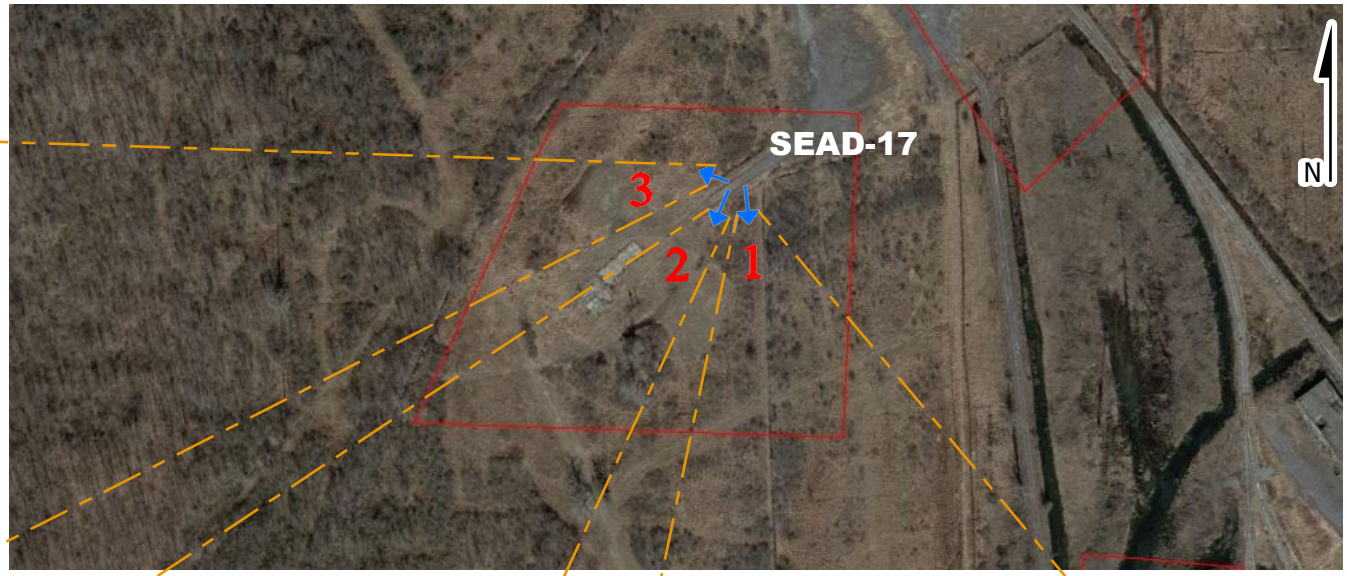
Photo Viewing Direction

SEAD-16
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US



17-3

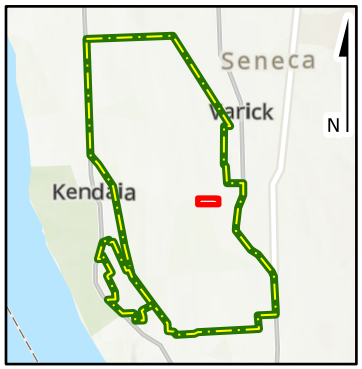




17-2



17-1



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-17
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 16	**Date of Inspection:**	02-03-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 22F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present.
No apparent groundwater use.
LTM groundwater monitoring in place.

Observations:

Current Land Use

Vacant Lot

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 17	**Date of Inspection:**	02-03-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 23F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

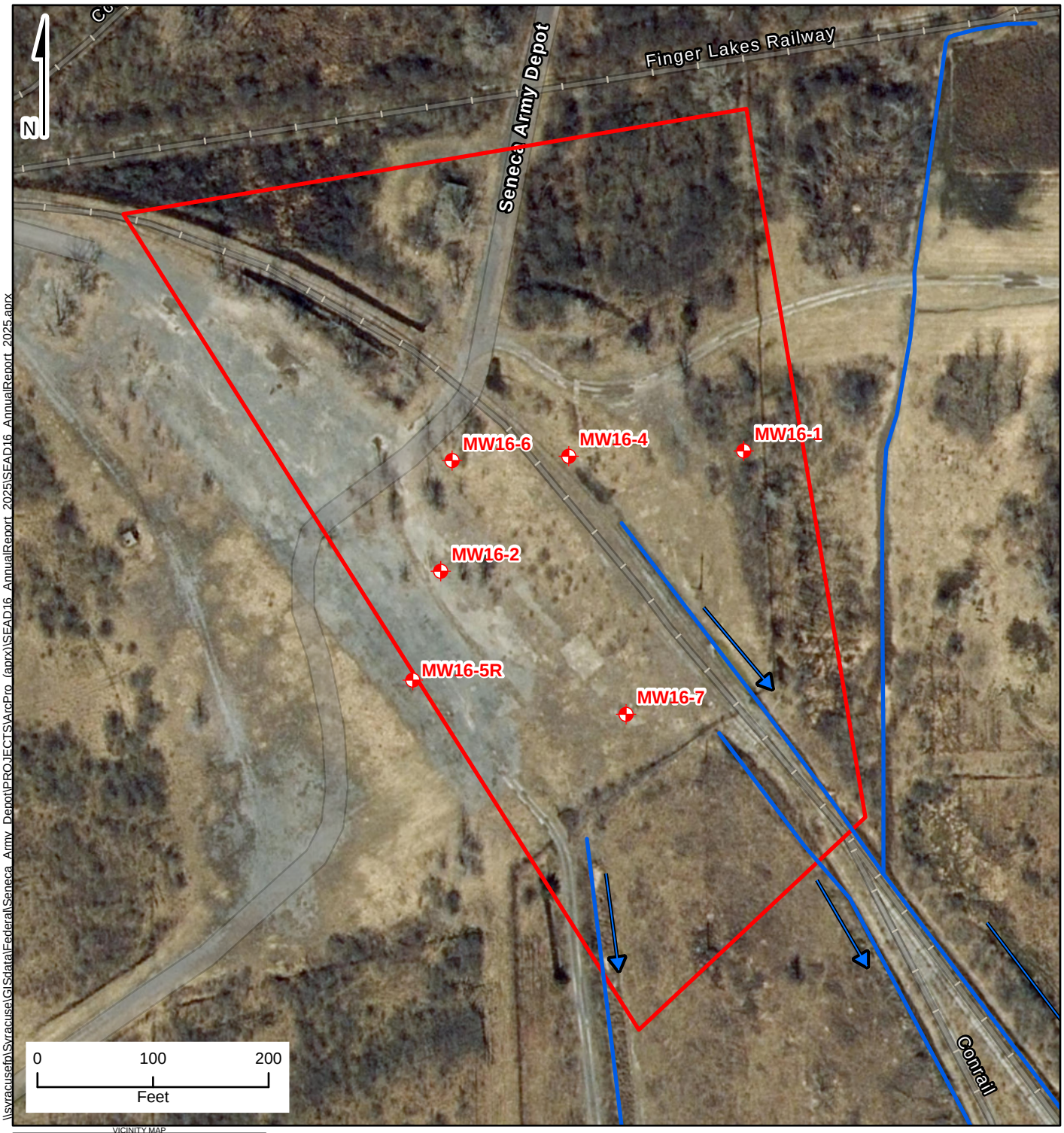
Vacant lot

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Erosion Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Adequate Signage?	☑ Yes	☐ No	☐ NA
If no, describe:			

II. Interviews

Attachment 3

SEAD-16 Site Features



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VICINITY MAP



Legend

- Former Seneca Army Depot Boundary
- SEAD-16 Boundary
- Drainage
- Surface Water Flow Direction
- LTM Sampling Monitoring Well

SEAD-16 Site Features

Seneca Army Depot (SEAD)
Romulus, Seneca County, New York

Map Date: 10/30/2025
Projection: NAD 1983 2011 State Plane New York Central FIPS 3102 Ft US

Appendix E

SEAD-59: Fill Area West of Building 135

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APPENDIX E: SEAD-59: FILL AREA WEST OF BUILDING 135

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-59 (Fill Area West of Building 135) is approximately 6.2 acres in size and encompasses an area located along both sides of an unnamed east-west dirt road that runs from the intersection of 4th Avenue, Administration Avenue, and South Street in SEAD's former Administration Area to the former location of Building 311 in SEAD-16. SEAD-59 was used for the disposal of construction debris and oily sludge. SEAD personnel have also indicated the area of SEAD-59 was used as a version of a local "Department of Public Works" yard where vehicles and materials were staged, and as a result a large quantity of miscellaneous "roads and grounds" debris remains, and has become intermixed with the native soils (USACE 2009b).

Initial Response

Work performed at SEAD-59 includes the ESI in 1994, a Phase I RI in 1997, a TCRA conducted in 2002, and a Phase II RI completed in 2006. A TCRA performed in 2002 included excavation and staging of impacted soils, sampling and analysis of excavated areas and stockpiled excavated soils, disposal of approximately 3,805 tons of contaminated soil (total from SEAD-59 and SEAD-71) at an approved off-site landfill, installation of groundwater monitoring wells, and backfilling and grading of open excavations with acceptable soil from the stockpiles (USACE 2002e, 2006d). The CCR for the Former Sewage Sludge Waste Piles (SEAD-5) (USACE 2010) provided record documentation of the completed remedial action construction activities for SEADs 59 and 71. Stockpiled soil generated during the SEAD-59/71 remedial actions (approximately 5,620 cy) was used as the initial cover layer in the engineered cover at SEAD-5.

Basis for Taking Action

Because of the human health risk in the soil and groundwater an action was required at SEAD-59 to ensure land use remains protective of site users. SEAD-59 is part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

The SEAD-59 soil and groundwater sample summary results and data evaluated for SEAD-59 are provided in the ROD (USACE 2009b). Results of test pitting operations completed during site investigation activities indicated that full and empty 15- and 55-gallon drums, 1-, 2- and 5-gallon paint cans, 20-gallon waste cans, and chain-linked fence were found buried at the site. No COCs were identified for SEAD-59 soil.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-59 the human health cancer risks were less than the CERCLA cancer risk management upper limit of 1×10^{-4} for industrial workers, construction

workers, and adolescent trespassers. The calculated non-cancer HI for the adolescent trespasser receptor was less than 1. The non-cancer HIs determined for the industrial worker and construction worker were 1 and 9, respectively.

It was determined that the elevated risks associated with exposure to metals in SEAD-59 groundwater result from metals that are associated with the native soils and waters in the geologic formation at SEAD and were not associated with a release from the AOC. When the hazard index contribution from SEAD-59 groundwater is removed, the HI levels computed for the industrial worker and the construction worker both fall to less than 1. A screening level ecological risk assessment (SLERA) was conducted and the results indicate that soil at SEAD-59 and in SEAD-59 stockpiled soil does not significantly impact ecological receptors in the area. No COCs were identified for SEAD-59 soil or SEAD-59 stockpiled soil. The SEAD-59 soil stockpiles ultimately were removed from SEAD-59 to be used as an initial cover layer in the engineered cover at SEAD-5.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled the *Fill Area West of Building 135 (SEAD 59) and the Alleged Paint Disposal Area (SEAD-71)* (USACE 2009b) requires the establishment of ICs for SEAD 59. The elements that composed the remedy included:

- Establish, maintain, and monitor LUCs at SEAD-59 that:
  - — Prohibit access to or use of the groundwater until UU/UE criteria are attained
  - — Prohibit the development or use of the property for residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained at SEAD-59

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the PID/Warehouse Area. This SEAD LUC RD exempted 14 sites, or parcels, identified as USACE Retained Sites. Addendum 4 to the SEAD LUC RD (USACE 2009c) included SEADs 1, 2, 5, 16, 17, 59, 71, 121C and 121I in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-59) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-59 is presented in **Table E.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-59, as part of the "PID Retained Parcels," was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed

for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table E.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table E.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table E.3.2**).

Table E.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-59	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table E.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-59	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-59	NA	Re-visit the conclusions of the risk assessment to demonstrate that the UU/UE conditions can be met in soil at SEAD-59 and that all risk exceedances can be attributed to naturally occurring concentrations of metals.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-59	NA	IF UU/UE can be met in soil, re-visit the conclusions of the risk assessment to demonstrate that either class GA groundwater standards can be met, or that the observed concentrations can be attributed to naturally occurring concentrations of metals.	Completed	Determined that elevated metals concentrations in groundwater can be attributed to the naturally occurring site geology and were not associated with a release from the AOC.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-59 was inspected on 4 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-59.

- No apparent access to or use of groundwater were observed at SEAD-59.

Interviews

Since SEAD-59 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-59.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehousing Area have been completed and documented. No continuing active remediation is required in the PID/Warehousing Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-59 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-59. SEAD-59 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes in the toxicity data and cleanup levels used at the time of the remedy. However, these changes are not expected to affect the protectiveness of the remedy.

The risk assessment did not determine potential risk concerns for in-situ soil. Potential risk concerns were identified for stockpiled soil. The soil stockpiles have been removed from SEAD-59 and used in the cap at SEAD-5. Therefore, potential risk concerns have been removed from the site. Additionally, potential risk concerns were not identified for groundwater. Soil COCs and cleanup levels were not identified in the ROD, and the site was considered acceptable for commercial/industrial use (USACE 2009b). LUCs were placed on the site because the risk assessment did not evaluate an unrestricted use and exposure scenario.

Groundwater contamination is assumed across the PID/Warehouse Area, including SEAD-59. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-59 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-59, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-59, and PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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Attachment 1

Photographic Log





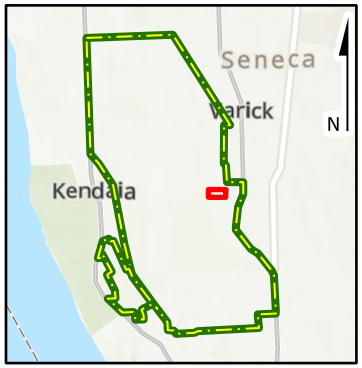
59-3



59-2



59-1



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-59
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 59	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix F

SEAD-71: Alleged Paint Disposal Area

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APPENDIX F: SEAD-71 ALLEGED PAINT DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-71 (the Alleged Paint Disposal Area) is wedge shaped and is located west of 4th Avenue near Buildings 114 and 127. The entire AOC is approximately 2.4 acres in size and bounded on the north and south by railroad tracks serving Buildings 114 and 127.

Prior to the 2001 RI, rumors suggested that paints and/or solvents were disposed of at SEAD-71 in burial pits (USACE 2001). The results of the RI test pitting operations failed to confirm the paint and oil disposal rumors but did indicate that the area had been used for the disposal of construction debris, including sheet metal, asphalt, chain link fencing, sand and stone, piping, railroad ties, wood and cinders. No dates of disposal are available nor is there any information on the number of suspected disposal pits that may have been used.

Initial Response

An ESI, consisting of geophysical investigations, soil investigations (including soil boring and test pitting), and groundwater monitoring well installation and sampling was performed in 1994. A Phase I RI included a ground penetrating radar survey, a surface soil investigation, and a test pitting program was conducted in 1997. The TCRA performed in 2002 included excavation and staging of impacted soils, sampling and analysis of excavated areas and stockpiled excavated soils, disposal of approximately 3,805 tons of contaminated soil (total from SEAD-59 and SEAD-71) at an approved off-site landfill, installation of groundwater monitoring wells, and backfilling and grading of open excavations with acceptable soil from the stockpiles. The Phase II RI, completed in 2006, included validating and evaluating the soil data generated during the 2002 TCRAs, conducting groundwater monitoring, and performing risk assessments to characterize potential residual risks to human health and the environment. The CCR for the Former Sewage Sludge Waste Piles (SEAD-5) (USACE 2010) provided record documentation of the completed remedial action construction activities for SEADs 59 and 71. Stockpiled soil generated during the SEAD-59/71 remedial actions was used as the initial cover layer at SEAD-5.

Basis for Taking Action

Due to the potential human health risk in soil and groundwater an action was required at SEAD-71 to ensure land use remains protective of site users. SEAD-71 is part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Summary results of chemical analyses performed on all SEAD-71 soil and groundwater samples, and a complete copy of the analytical data for the all SEAD-71 surface and subsurface soil and groundwater evaluated during the investigation are provided in the ROD (USACE 2009b). The

results of the RI test pitting operations indicated that the area had been used for the disposal of construction debris.

Human Health and Ecological Risk Assessment

The risk assessment concluded that the human health cancer risks associated with all soil (i.e., inside and outside of Fenced Area) and groundwater at SEAD-71 were less than the CERCLA cancer risk management upper limit of 1×10^{-4} for both the construction worker and the adolescent trespasser. The potential cancer risk determined for the industrial worker is 2×10^{-4}. Results for two reasonable maximum exposure scenarios are presented in the ROD (USACE 2009b); one including all SEAD-71 soil (i.e., inside and outside of the Fenced Area) and one considering only soil located exterior to the Fenced Area.

It was concluded that the elevated cPAH concentrations in surface soil within the Fenced Area at SEAD-71 are not associated with any release at the site but are directly associated with the pavement and crushed rock pad that is still in place at the AOC. Therefore, a risk assessment was conducted for SEAD-71 in which all soil data from the Fenced Area was excluded from the risk evaluation.

For exposure to SEAD-71 soil and groundwater outside the Fenced Area, the cancer risks for all receptors are below the EPA upper limit of 1×10^{-4}. The total non-cancer hazard index for the adolescent trespasser is below the EPA target limit of 1. The non-cancer hazard indices for the industrial worker and construction worker are 3.5 and 13, respectively. The risk associated with groundwater intake contributes a significant portion of the total non-cancer hazard indices for the receptors. However, it was noted that elevated concentrations in SEAD-71 groundwater are generally comparable with the SEAD background and may have been overstated in upgradient wells due to limited volume and potentially elevated turbidity.

A SLERA was conducted and the results indicate that soil at SEAD-71 does not significantly impact ecological receptors in the area. No COCs were identified for SEAD-71 soil for ecological receptors.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for the Fill area West of Building 135 (SEAD-59) and the Alleged Paint Disposal Area (SEAD-71)* (USACE 2009b) requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained at SEAD-71.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to or use of groundwater until UU/UE criteria is attained.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the PID/Warehouse Area. This SEAD LUC RD exempted 14 sites, or parcels, identified as USACE Retained Sites. Addendum 4 to the SEAD LUC RD (USACE 2009c) included SEADs 1, 2, 5, 16, 17, 59, 71, 121C and 121I in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-71) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-71 is presented in **Table F.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-71, as part of the "PID Retained Parcels," was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table F.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning. 10 June 2011.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant. 10 June 2011.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table F.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table F.3.2**).

Table F.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-71	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table F.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-71	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-71	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values to determine if UU/UE conditions can be met in soil at SEAD-71.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-71	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-71.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-71 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-71.

- No apparent access to or use of groundwater.

Interviews

Since SEAD-71 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-71.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026 all remedies are functioning as intended by the decision document.

The remedy implemented at SEAD-71 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the AOCs within the PID/Warehousing Area of the former Depot has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-71. SEAD-71 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been no changes in the exposure pathway or changes in the physical conditions of the site since completion of remedial action activities and implementation of LUCs that would affect the protectiveness of the remedy selected for the PID/Warehouse Area of the former SEAD. There have been changes to toxicity data used at the time of the remedy. However, these changes would not affect the protectiveness of the remedy.

Soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2009a). Potential risk concerns associated with commercial/industrial use were determined to be consistent with background concentrations. Lead was evaluated as a potential COCs. On 16 October 2025, the EPA updated guidance for evaluating residential lead exposures at CERCLA and RCRA Sites (EPA 2025). While SEAD-71 is not a residential sites, the EPA revised lead guidance lowered the target blood-lead level from 10 µg/dL to 5 µg/dL when evaluating lead in soil. To evaluate this change to the target blood-lead level, the arithmetic mean concentration of lead in soil was compared to the EPA residential and industrial soil RSL and NYSDEC SCOs. The SEAD-71 lead arithmetic mean concentration was determined based upon the soil dataset presented in Appendix D of the ROD (USACE 2009a). The lead arithmetic mean concentration was 115 mg/kg. This concentration is below the EPA industrial soil RSL of 800 mg/kg and the NYSDEC restricted residential SCO of 400 mg/kg. Therefore, changes in the lead evaluation do not affect the protectiveness of the remedy.

LUCs were placed on the site because the risk assessment did not evaluate an unrestricted use and exposure scenario. Groundwater contamination is assumed across the PID/Warehouse Area; therefore, groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-71 and the PID/Warehousing Areas. There have been no changes in the

physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-71, and PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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Attachment 1

Photographic Log





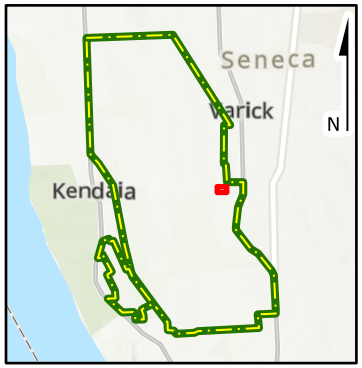
71-2



71-1



71-3



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-71
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 71	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20 F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix G

SEAD-121C: Defense Reutilization and Marketing Office Yard, and 121I: Rumored Cosmoline Oil Disposal Area

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APPENDIX G: SEAD-121C DEFENSE REUTILIZATION AND MARKETING OFFICE YARD AND 121I RUMORED COSMOLINE OIL DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-121C, the Defense Reutilization and Marketing Office (DRMO) Yard, is a triangular-shaped gravel lot, approximately 8.75 acres in size, located roughly 4,000 feet southwest of SEAD's main entrance off State Route 96. The DRMO Yard was used to store scrap metal, vehicles, and other items that were no longer needed for national defense, or that did not comply with legislative and regulatory requirements. The group using the yard was responsible for property reuse (including resale), hazardous property disposal (offsite, at licensed/permitted facilities), precious metals recovery and recycling program support (USACE 1999b, 2008b).

SEAD-121I, the Rumored Cosmoline Oil Disposal Area, encompasses four rectangular-shaped, open grass and dirt covered areas that are bounded by 3rd and 7th Streets (north and south ends, respectively) and Avenues C and D (west and east sides, respectively). The overall size of the AOC is approximately 16.8 acres. Approximately 1.2 acres of this area were previously used for the staging of strategic stockpiles of ferromanganese ore (USACE 2008b).

Initial Response

Two environmental investigations were conducted to document the environmental conditions present at SEAD- 121C, the DRMO Yard and at SEAD-121I, the Rumored Cosmoline Oil Disposal Area. In addition, two removal action were also performed independently at SEAD-121C and SEAD-121I, and confirmatory soil sample data were developed as part of the removal action activities.

Sampling was performed at both 121C and 121I in 1998 (limited EBS) to determine if hazardous substances were present, and between 2002 and 2003 (RI) to more thoroughly investigate Site conditions; the results of these efforts were reported in the RI Report (USACE 2006e). Additional data pertinent to the existing environmental conditions remaining at the AOC were subsequently developed during an interim removal action in 2007. Soil excavations were performed at SEAD-121C for the elevated levels of lead, and at the former stockpile locations in SEAD-121I to address manganese residuals. The sampling and analysis conducted during the cleanup action are presented in the CCR for SEAD-121C and SEAD-121I and are summarized in Section 3 of the ROD (USACE 2008b).

Basis for Taking Action

Due to human health risk in soil and potential risk in groundwater which hasn't been fully investigated an action was required at SEAD-121I and SEAD-121C to ensure land use remains protective of site users. SEAD-121I and SEAD-121C are part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Conditions present at SEAD-121C were investigated during a multimedia RI conducted in 2002 and 2003 (USACE 2006e). Samples of surface and subsurface soil, groundwater, surface water, and "ditch soil" found in man-made culverts adjacent to the AOC were collected and analyzed for target compound list (TCL)/target analyte list (TAL) compounds (USACE 2006e). The only analytes found at concentrations in excess of NYSDEC's Technical and Administrative Guidance Memorandum (TAGM) Industrial Use SCO were two cPAHs (benzo[a] pyrene and benzo[b] fluoranthene) and lead. Additional data pertinent to the existing environmental conditions remaining at the AOC was subsequently developed during the interim removal action that was performed at the site (USACE 2008d). These data are provided in the CCR for SEAD-121C that describes and summarizes the results of the interim removal action that was performed for the elevated levels of lead. The primary human health COCs identified at SEAD-121C, the DRMO Yard, include benzene, seven cPAHs, dieldrin, three Aroclor congeners (i.e., 1242, 1254, and 1260) and several metals (e.g., arsenic, lead, etc.).

USACE indicated that the rail spur and sidings were used for delivery of equipment and machinery that was frequently packed in Cosmoline oil. Cosmoline oil is a commonly used substance that prevents corrosion on metal parts and components. During delivery and unpacking of the equipment and machinery, oil from the packing may have been deposited on the ground. The U.S. Government historically staged strategic stockpiles of ferromanganese ore in portions of SEAD-121I, and these stockpiles were present during the EBS and RI sampling events and into the early part of 2007. Samples of surface and subsurface soil, surface water and "ditch soil" found in man-made culverts adjacent to the AOC were collected and analyzed for TCL/TAL compounds. The primary human health COCs identified at SEAD-121I, the Rumored Cosmoline Disposal Area, include seven cPAHs, dieldrin, heptachlor epoxide, and six metals (e.g., arsenic, chromium, iron, manganese, thallium, and vanadium).

No groundwater COPCs were identified for SEAD-121C or SEAD-121I. Chemicals detected in the groundwater at SEAD-121C were not found at levels that surpassed EPA's risk assessment screening values, while groundwater was not encountered in the thin overburden layer that overlies the bedrock in SEAD-121I.

Human Health and Ecological Risk Assessment

Human Health Risk

The risk assessment concluded that at SEAD-121C the human health cancer risks are within or below the CERCLA cancer risk management range of 1 x 10-4 to 1 x 10-6, and the calculated non-cancer HI for all receptors are less than 1.0. However, there was an area in the northern portion of this AOC where soil concentrations of lead were present at levels in excess of NYSDEC's Restricted Commercial and Industrial Use SCOs, and where prudent management decisions indicated that a focused removal action should be performed to lessen future exposures to users or occupants of the land. An excavation was performed, and confirmatory soil sampling results indicate that the identified area of elevated lead was removed. For SEAD-121C, complete details of the human health risk assessment for each exposure route evaluated are presented in

Appendix E of the Final RI Report (USACE 2006e) for soil, ditch soil, groundwater, and surface water exposure.

The risk assessment concluded that at SEAD-121I the human health cancer risks are within or below the CERCLA cancer risk management range of 1 x 10-4 to 1 x 10-6, and the calculated non-cancer HI for all receptors except for the construction worker (1.5) are less than 1.0. For SEAD-121I, the post-cleanup action non-carcinogenic hazard indices and carcinogenic risk results for the scenarios evaluated are summarized in Table 7-9 of the ROD (USACE 2008b). Details of the revised human health risk assessment for each exposure route are presented in Appendix E of the ROD for soil, ditch soil, and surface water exposure. Since this calculation, the ore piles were removed and the former staging areas cleaned up. The most significant contributing COPC (i.e., manganese) was reduced to levels below commercial and industrial cleanup objective levels, and the associated risk at SEAD- 121I is considered suitable for its continuing use as industrial or commercial property.

Ecological Risk

An ecological risk assessment was performed for SEAD-121C. Preliminary screening level HQs were computed, and USACE applied the EPA's recommended refinement of COC process to the results of the SLERA to determine if evaluation of ecological risks was warranted. After application of the refinement of COC process, no COCs were identified for SEAD-121C soil, SEAD-121C ditch soil, or SEAD-121C surface water and the rationales are summarized below. Specific details of the Refinement of COC Process are presented in the Final RI Report (USACE 2006e) Sections 7.6.2 through 7.6.4. Based on the discussion, soil, ditch soil, surface water, and groundwater at SEAD-121C are not expected to significantly impact ecological receptors and no further action is warranted at SEAD-121C based on the ecological risk assessment.

An ecological risk assessment was performed for SEAD-121I. Preliminary screening level HQs were computed, and USACE applied the EPA's recommended refinement of COC process to the results of the SLERA to determine if evaluation of ecological risks was warranted. After application of the refinement of COC process, no COCs were identified for SEAD-121I soil, ditch soil, or surface water and the rationales are summarized below. The reader is referred to the Final RI Report (USACE 2006e) Section s7.6.5 through 7.6.7 for specific details of the Refinement of COC Process. The source of the metal contamination at SEAD-121I was the strategic stockpiles of ferrous-manganese ore previously stored at the AOC. These stockpiles were removed in 2007, and a post-mission cleanup action was taken to remove residues associated with the historical stockpiling activities. Based on the above discussion, soil, ditch soil, and surface water at SEAD-121I are not expected to significantly impact ecological receptors and no further action is warranted at SEAD-121I based on the ecological risk assessment.

REMEDIAL ACTIONS

Remedy Selection

The RODs titled *Defense Reutilization and Marketing Office (DRMO) Yard (SEAD 121C) and the Rumored Cosmoline Oil Disposal Area (SEAD-121I)* (USACE 2008b) require the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained at the two AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 4 to the SEAD LUC RD added SEADs 1, 2, 5, 16, 17, 59, 71, 121C, and 121I in accordance with the SEAD LUC RD Supplementation provision. An Environmental Easement for the PID/Warehouse Area including properties that had been previously retained (including SEAD-121C and SEAD-121I) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-121C and SEAD-121I is presented in **Table G.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-121C and SEAD-121I as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table G.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area (including SEAD-121C and SEAD-121I)	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning. 14 February 2011.
Groundwater	No (121C); unknown (121I) (1)	Yes (2)	SEAD PID/ Warehousing Area (including SEAD-121C and SEAD-121I)	Prevent access or use of the groundwater until New York States GA groundwater Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant. 14 February 2011.

Notes:

(1) For SEAD-121C, chemicals detected in the groundwater were not found at levels that surpassed EPA's risk assessment screening values. For SEAD-121I, groundwater was not encountered and thus no equivalent evidence of poor groundwater quality exists for this AOC.

(2) SEAD-121C and SEAD-121I are located within the PID/Warehouse Area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although no risk was identified within the soil and risk was not identified and unknown with respect to groundwater, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table G.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table G.3.2**).

Table G.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-121C and SEAD-121I	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table G.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-121C and 121I	N/A	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	N/A
SEAD-121C and 121I	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values to determine if UU/UE conditions can be met in soil at SEAD-121C and 121I.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-121C and 121I	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-121C and 121I.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-121C and SEAD-121I were inspected 4 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-121C and 121I.

- No apparent access to or use of groundwater were observed at SEAD-121C and 121I.

Interviews

Since SEAD-121C and SEAD-121I is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-121C and SEAD-121I.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-121I and SEAD-121C is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the AOCs within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-121C and SEAD-121I. SEAD-121C and SEAD-121I are currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been no changes in the exposure pathway or changes in the physical conditions of the site since completion of remedial action activities and implementation of LUCs that would affect the

protectiveness of the remedy selected for the PID/Warehouse Area of the former SEAD. There have been changes to toxicity data used at the time of the remedy. However, these changes would not affect the protectiveness of the remedy.

Soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2009a). Potential risk concerns associated with commercial/industrial use were determined to be consistent with background concentrations. Lead was evaluated as a potential COCs. On 16 October 2025, EPA updated guidance for evaluating residential lead exposures at CERCLA and RCRA sites (EPA 2025). While SEAD-121C is not a residential site, EPA revised lead guidance lowered the target blood-lead level from 10 µg/dL to 5 µg/dL when evaluating lead in soil. The change in the target blood-lead level also affects sites that include commercial or industrial worker receptors. As discussed in Appendix D, to evaluate this change to the target blood-lead level, the lead cleanup level of 1,250 mg/kg was assessed in the EPA Adult Lead Methodology (ALM) (**Table D.5.2**). To achieve a specific level of protectiveness, the EPA has set to limit exposure to soil lead levels such that a typical (or hypothetical) child or population would have an estimated risk of no more than 5% of the population exceeding the target blood-lead level. The ALM reveals that 7.7% of the population exceeds the target blood-lead level of 5 micrograms per deciliter (µg/dL), which exceeds EPA's limit of 5% (**Table D.5.2**). However, the cleanup goal does not represent the soil lead concentrations that remained at the SEAD-121C.

Lead was addressed through a removal action with a cleanup level of 1,250 mg/kg. To evaluate this change to the target blood-lead level, the concentration of lead in soil was compared to the EPA residential and industrial soil RSL and NYSDEC SCOs. A re-evaluation of soil lead concentrations after the removal action revealed a mean of 427.8 mg/kg (USACE 2008b). This concentration is below the EPA commercial/industrial soil RSL of 800 mg/kg and the above NYSDEC restricted residential SCO of 400 mg/kg. Therefore, changes in the lead evaluation do not affect the protectiveness of the remedy. **Table G.5.1** describes soil cleanup level comparisons.

LUCs were placed on the site because the risk assessment did not evaluate an unrestricted use and exposure scenario. Groundwater contamination is assumed across the PID/Warehouse Area; therefore, groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

286 **Table G.5.1 Comparison of Toxicity Data and Cleanup Levels in Soil**

COPCs Listed in ROD	Comparison of Screening Levels		Comparison of Potential Cleanup Levels		Is there a newly promulgated cleanup goal or published screening level? (Y/N)	Are the newly promulgated screening levels or cleanup goals less than those used in the ROD? (Y/N)
	Former Screening Value in ROD (Residential Use) (1)	Current Federal Screening Level (Residential Use)(2)	Former Potential ARAR/TBC in ROD (1)	Current NYSDEC Soil Cleanup Objectives (Unrestricted Use)(2)		
PAHs						
Benzo(a)anthracene	1	1.1	ROD did not establish cleanup levels		Y	N
Benzo(a)pyrene	1	0.11			Y	Y
Benzo(b)fluoranthene	1	1.1			Y	N
Benzo(k)fluoranthene	0.8	11			Y	N
Chrysene	1	110			Y	N
Dibenz(a,h)anthracene	0.33	0.11			Y	Y
Indeno(1,2,3-cd)pyrene	0.5	1.1			Y	N
Pesticides/PCBs						
Dieldrin	0.005	0.034	ROD did not establish cleanup levels		Y	N
Aroclor-1242	0.74	0.23			Y	Y
Aroclor-1254	0.10	0.12			Y	N
Aroclor-1260	0.10	0.24			Y	N
VOCs						
Benzene	0.06	1.2	ROD did not establish cleanup levels		Y	N
Metals						
Antimony	--	3.1	ROD did not establish cleanup levels		Y	N
Arsenic	13	0.68			Y	Y
Copper	50	310			Y	N
Iron	--	5500			Y	N
Lead	63	400			Y	N

287 Notes:
288 (1) Former screening levels and former ARARs/to be considered (TBCs) presented in the table originate from the site-specific ROD
289 (2) State soil cleanup goals are from 6 CRR-NY 375-6.8 (b) Unrestricted Use Soil Cleanup Objectives; Verified 9/21/2020.
290 Federal soil screening values are EPA RSLs for Residential Soil based on a target HQ = 0.1; updated May 2020.
291 "--" Indicates no criteria/MCL or not applicable
292 Units are in milligrams per kilogram (mg/kg)
293

294 **Table G.5.2 Comparison of Toxicity Data and Cleanup Levels in Groundwater**

COPCs Listed in ROD	Comparison of Screening Levels		Comparison of Potential Cleanup Levels		Is there a newly promulgated cleanup goal or published screening level? (Y/N)	Are the newly promulgated screening levels or cleanup goals less than those used in the ROD? (Y/N)
	Former Screening Value in ROD (Residential Use) (1)	Current Federal Screening Level (Residential Use)(2)	Former Potential ARAR/TBC in ROD (1)	Current NYSDEC Soil Cleanup Objectives (Unrestricted Use)(2)		
PAHs						
Benzo(a)anthracene	1	1.1	ROD did not establish cleanup levels		Y	N
Benzo(a)pyrene	1	0.1			Y	Y
Benzo(b)fluoranthene	1	1.1			Y	N
Benzo(k)fluoranthene	0.8	11.0			Y	N
Chrysene	1	110.0			Y	N
Dibenz(a,h)anthracene	0.33	0.1			Y	Y
Indeno(1,2,3-cd)pyrene	0.5	1.1			Y	N
Pesticides/PCBs						
Dieldrin	0.005	0.034	ROD did not establish cleanup levels		Y	N
Heptachlor Epoxide	--	0.1			Y	N
Metals						
Arsenic	13	0.7	ROD did not establish cleanup levels		Y	Y
Chromium	30	12000			Y	N
Iron	--	5500			Y	N
Manganese	1600	180			Y	Y
Thallium	--	0.078			Y	N
Vanadium	--	39			Y	N

295 Notes:
296 (1) Former screening levels and former ARARs/TBCs presented in the table originate from the site-specific ROD
297 (2) State soil cleanup goals are from 6 CRR-NY 375-6.8 (b) Unrestricted Use Soil Cleanup Objectives; Verified 9/21/2020.
298 Federal soil screening values are EPA RSLs for Residential Soil based on a target HQ = 0.1; updated May 2020.
299 "--" Indicates no criteria/MCL or not applicable
300 Units are in milligrams per kilogram (mg/kg)

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-121C, SEAD-121I, and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

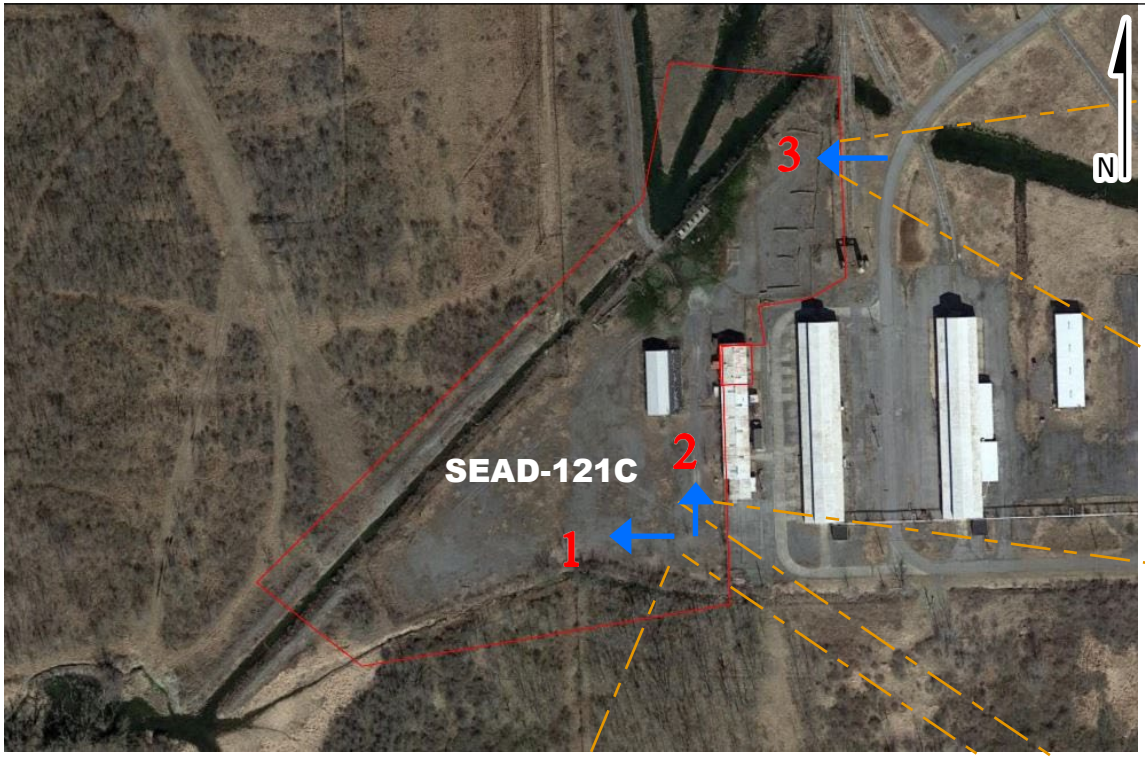
PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-121C, SEAD-121I, and PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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Attachment 1

Photographic Log





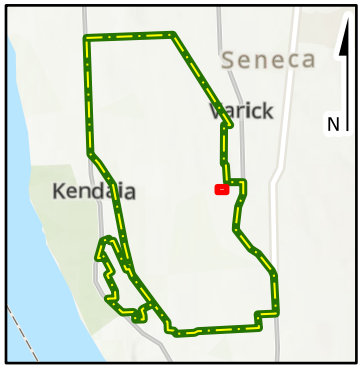
121C-3



121C-2



121C-1



Legend

- Former Depot Boundary
- Photo Viewing Direction

SEAD-121C
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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121I-3



121I-2



121I-1





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-121I
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 121I	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 121C	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Erosion Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Adequate Signage?	☑ Yes	☐ No	☐ NA
If no, describe:			

II. Interviews

Appendix H

SEAD-25: Fire Training and Demonstration Pad

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APPENDIX H: SEAD-25 FIRE TRAINING AND DEMONSTRATION PAD

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Fire Training and Demonstration Pad (SEAD-25) site is located in the east-central portion of SEAD. The site is bounded to the east by Administration Avenue beyond which is undeveloped land covered by deciduous trees; to the south by Ordnance Drive beyond which is an open grassy field and a stand of coniferous trees; to the west by grassland, brush and conifers; and to the north by grassland and a baseball field.

SEAD-25 was in use from the late-1960s to the late-1980s. The pad was used for fire control training. During the 1980s, the pad was used twice for firefighting demonstrations, once in 1982 or 1983 and in 1987.

In 2017, USACE launched an SI at three previously investigated sites (SEAD-25, SEAD-26, and SEAD-122E), which were formerly used as fire training areas, to determine whether the sites were impacted with PFAS. The data from the SI showed that the concentrations of the two primary PFAS constituents, PFOA and PFOS, were measured in exceedance of the EPA HA levels in all 12 of the wells sampled at SEAD-25. As a result, SEAD-25 proceeded to an ESI with a focus on further delineating the PFAS extents in the area (USACE 2018). The results from the ESI indicate that SEAD-25 is primary source area for PFAS. Groundwater results indicate that PFAS were detected within the upper water bearing zone (overburden) with little impacts to the lower water bearing zone (bedrock). Source areas soils likely contribute to elevated concentrations of PFAS above the project action limits (PALs) to groundwater through leaching. Surface water concentrations within the AOC and downgradient are impacted with PFAS. SEAD-25 exhibits PFAS signatures consistent with former AFFF use; however, the signatures are not consistent between other site investigated during the ESI (SEAD-26) suggesting the use of various formulations of AFFF over the site history or potentially different environmental conditions which are affecting the fractionation of the various individual PFAS differently (USACE 2022a). There are no known completed groundwater exposure pathways at these sites. SEAD-25 and SEAD-26 are currently being investigated as part of a PFAS RI at the site. The RI is intended to further characterize potential PFAS sources and potential pathways for contaminant migration near the suspected source areas. RI outcomes are not final at the time of this review.

Initial Response

SEAD-25 is described in three reports issued prior to the RI. The first report was the Work Plan for CERCLA ESI of 10 SWMUs (USACE 1993). This report detailed the site work and sampling performed under the ESI. The second report was an SWMU Classification Report (USACE 1994a), which was undertaken to describe and evaluate the SWMU at SEAD. The third was an ESI Report (USACE 1995b), which described a more detailed investigation of SEAD-25. The fieldwork for the ESI was conducted according to the Work Plan for CERCLA ESI of 10 SWMUs. Based on the results of the ESI, a RI Work Plan was prepared and the RI field program

was conducted. A RI and feasibility study (FS) were completed for SEAD-25/26 in May 1998 and October 1998, respectively.

As part of a 2005 remedial action, approximately 961 cy of benzene, toluene, ethylbenzene, and xylene (BTEX) impacted soil was removed from the pad area and approximately 761 cy of SVOC-impacted soils were removed from a swale. The excavations were completed down to bedrock and the excavated soils were disposed of offsite. The pad excavation was backfilled and restored to the existing grade (USACE 2005d, 2006a). LTM for BTEX constituents is ongoing at SEAD-25 and has been conducted since 2007 (USACE 2007b, 2019). BTEX detections are limited to a single well and the concentrations are trending down. As such, in May 2020 EPA approved a ramp-down strategy to reduce sampling frequency. In addition, as of the time of this report the site is being investigated for PFAS as part of an RI.

Basis for Taking Action

Because of the human health risk in soil and groundwater an action was required at SEAD-25 to ensure land use remains protective of site users. SEAD-25 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

The primary COCs at SEAD-25 are VOCs, specifically BTEX compounds in both soil and groundwater, as well as lesser amounts of chlorinated ethene compounds in groundwater. The VOC contaminants were believed to have been released to the environment during fire training activities at the Pad. In addition, varying concentrations of SVOCs were also detected in the soil and sediment, mainly in the drainage ditches on the periphery of the site. The primary impact to the groundwater resulted from two overlapping VOC plumes that both originated at the southwestern portion of SEAD-25 pad, neither of which extended beyond Ordnance Drive. The primary plume was approximately 200 feet long and composed of BTEX which is typically associated with gasoline. Results of groundwater contour mapping indicated that groundwater flow is radial below the pad, with a strong horizontal gradient to the south and west. The radial groundwater flow that has developed below the pad at SEAD-25 is believed to be a local phenomenon that is present because of the influence of the anthropomorphic bedrock topographic mound located below the pad. Less significant impacts from other contaminants were also detected at the site.

PFAS constituents are being investigated as part of an RI, PFOA and PFOS being the primary PFAS of concern. These constituents were identified after the ROD was completed. The investigation of SEAD-25 for PFAS is ongoing at this time.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-25 there are human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for the current and future on-site construction worker, but above for the future on-site resident (1×10^{-3}). The calculated non-cancer HI for the construction worker (HI=4) and resident (HI=10) for child and (HI=5) for adult

were greater than 1.0, but less than 1.0 for the current site worker. These risks are mainly due to inhalation of VOCs in the ambient air and potential exposure of receptors to on-site groundwater containing benzene as their sole drinking water source.

The results of the ecological risk assessment presented in the RI Report (USACE 1998a) concluded that there was negligible risk to the ecosystems of the SEAD-25 study area. During the field evaluation, no overt acute toxic impacts were noted. The quantitative ecological risk evaluation determined that a possibility exists for the COPCs to present a small potential for environmental effects due to sediment at SEAD-25.

The investigation of SEAD-25 for PFAS is ongoing at this time.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *The Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD- 26)* (USACE 2004b) required the following remedy and establishment of ICs. The elements that composed the remedy included:

- Excavate soil at the source in an area approximately 60 feet by 100 feet to a depth of 6 feet (approximately 1,350 cy)
- Excavate a volume of sediment approximately 780 feet long, 3 feet wide, and 2 feet deep (approximately 175 cy) from the northwest ditch
- Dispose of excavated soils in an appropriate off-site facility
- Dewater the excavation pit
- Treat groundwater that is recovered during excavation and during dewatering of excavation pit with an on-site air stripper
- Replace excavated soil with clean backfill and establish a ground cover to avoid soil erosion
- Conduct groundwater monitoring of the plume until NYSDEC Class GA groundwater standards are achieved (approximately 10 years)
- Establish and maintain LUCs to prevent access to or use of groundwater until cleanup standards are met. LUCs include to:
    - Prohibit the development and use of property for residential housing, elementary and secondary schools, childcare facilities and playground activities.

- Prevent access to or use of the groundwater until NYS Class GA Groundwater Standards are met.

- Maintain the integrity of any current or future remedial or monitoring system at SEAD-25.

- Complete a review of the selected remedy every 5 years (at minimum), in accordance with Section 121(c) of the CERCLA

- Prepare a contingency plan that may include additional monitoring and air sparging of the plume, as necessary

- Once NYSDEC Class GA groundwater cleanup standards are achieved, the groundwater use restriction may be eliminated.

To contextualize the risk potential at SEAD-25, it is to be noted that the ROD states that sediment is not believed to be a significant media of interest at the site. A significant portion of the risk was attributed to aquatic receptors, the ecological quotient is based on continuous exposure to the contaminants in the sediment in the ditches. However, the drainage ditches on the sites only contain water for a limited period of time after heavy rains or from snow melt. Thus, aquatic organisms are unlikely to be present in the drainage ditches when the conditions in the ditches are not aquatic (USACE 2004b).

Remedy Implementation

The CCR (USACE 2006a) for the Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD-26), describes remedial action activities at SEAD-25 and SEAD-26 and presents sample collection and laboratory test results, record survey data, record (as-built) drawings, and photo documentation to demonstrate compliance with the requirements set forth by the ROD (USACE 2004b) and the RD Work Plan and Design Report (USACE 2005b).

The excavation of the BTEX impacted soil at the pad at SEAD-25 began on 15 November 2005 and was completed on 1 December 2005, with soil removal totaling 961 cy. All confirmatory soil samples collected from the sidewalls of the excavation area and analyzed for VOCs and SVOCs representative of soil remaining onsite at the pad achieved the site-specific cleanup goals, and the soils at SEAD-25 do not require further action. The excavation of the soil at the pad removed the source of groundwater contamination.

Excavation of the SVOC impacted swale at SEAD-25 began on 7 November 2005 and was completed on 8 November 2005. The excavation extended from the toe of slope on one bank to the toe of slope on the other bank, resulting in the removal and off-site disposal of the swale soil (761 cy) at SEAD-25. Since the swale bottom consisted of exposed competent bedrock following excavation, no native material remained in the swale and confirmatory samples were not collected. A total of 1,722 cy (approximately 2,600 tons) of soil were excavated from the pad and the swale at SEAD-25 and disposed offsite at Ontario County Landfill. The pad excavation

was backfilled and restored to the existing grade. LTM is currently on-going at SEAD-25 and has been conducted since 2007 (USACE 2007b, 2019a).

SEAD-25 and SEAD-26 Soil Removal Cleanup Goals		
Analyte	**Cleanup Goal (µg/Kg)**	**Goal Met?**
Volatile Organic Compounds		
1,1,1-Trichloroethane	800	Yes
1,1-Dichloroethane	200	Yes
Benzene	60	Yes
Chloroform	300	Yes
Ethyl Benzene	5,500	Yes
Toluene	1,500	Yes
Trichloroethene	700	Yes
Xylene (total)	1,200	Yes
Semivolatile Organic Compounds		
2-Methylnaphthalene	36,400	Yes
Naphthalene	13,000	Yes
Phenol	30	Yes
cPAHs (SEAD-26 only)		
cPAHs (BTE)*	10	Yes

Notes:
*cPAHs were only sampled at SEAD-26 and were compared to the Benzo(a)pyrene Toxicity Equivalence. NYSDEC TAGM values from Technical and Administrative Guidance Memorandum HWR-92-4046, 24 January 1994

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 1 to the SEAD LUC RD (USACE 2007e) added SEAD 25, and 26 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-25) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-25 is presented in **Table H.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-25 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table H.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York States GA groundwater Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
Monitoring Well Network	Yes	Yes	SEAD-25	Maintain the integrity of any current or future remedial or monitoring system.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

Progress Since Last Five-Year Review

This section includes the protectiveness determinations and statements from the last FYR (**Table H.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table H.3.2**).

Table H.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-25	Protective	The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years. Additionally, SEAD- 25 is located within the PID area, within which, an environmental easement and deed restriction prohibit both residential use and the use of groundwater.

Table H.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-25	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-25	NA	Proposed changing the sampling frequency from annual to every 5 years in a Technical Memorandum submitted in March 2020.	Ongoing	Current LTM sampling consists of sampling MW25-31S annually for 5 years starting in 2023 and sampling MW25-2 every 5 years with 2025 being the most recent event.	NA
SEAD-25	NA	Once a well has documented concentrations below the applicable groundwater quality standard after two rounds of sampling, no further groundwater monitoring is needed. Pending regulatory approval, the monitoring well will be abandoned in accordance with state regulations.	Ongoing	Annual sampling is ongoing.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

In accordance with the ROD for the Fire Training and Demonstration Pad (SEAD-25) and the Final RD Report (USACE 2006b), long-term groundwater monitoring is being performed at SEAD-25 as part of the continuing post-closure monitoring and maintenance operations.

Groundwater monitoring was initially required as a condition of the ROD since contaminant concentrations found in the groundwater at the AOCs prior to the remedial action exceeded applicable groundwater standards. Semi-annual (i.e., twice each year) groundwater monitoring was performed at SEAD-25 from 2006 through 2011, and annual groundwater monitoring has been performed from 2011 to 2025 (present). A summary of the groundwater trends based on the RI results, post-remedial action to date is summarized in the Draft 2025 SEAD-25 Annual Report (USACE 2026b).

Based on the post-remedial action monitoring event results for SEAD-25 USACE currently reports that:

- The concentrations of BTEX in the groundwater at SEAD-25 have decreased by up to two orders of magnitude since 1994.
- VOC concentrations at SEAD-25 have attenuated to levels close to or below the applicable groundwater standards.
- The general trends of the field indicator parameters for most of the LTM wells provide inconclusive evidence due to the historical lack of VOC contamination at these wells and the lack of an upgradient or background well for comparison; however, typically low dissolved oxygen and negative oxidation-reduction potential values at MW25-2 and MW25-31S suggests an environment conducive to anaerobic degradation.
- COCs are limited in concentration and are not migrating outside the vicinity of MW25-2 and MW25-31S. In general, any remaining contamination is restricted to the area in the vicinity of MW25-2 and MW25-31S.
- Based on evaluation of available LTM data, the soil excavation remedy at SEAD-25 has been effective.
- The land and groundwater use restrictions imposed at SEAD-25 are maintained as part of both the approved ROD for SEAD-25 and the larger PID or Warehousing Area ("PID Area") (USACE 2004a, 2004d). There are no signs of unauthorized use or access.

Site Inspection

SEAD-25 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**. Well inspections were also performed during groundwater sampling events, and a figure that shows the site features, including the monitoring wells, is contained in **Attachment 3**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-25.
- No apparent access to or use of groundwater.

Interviews

Since SEAD-25 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-25.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LTM Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-25 currently protects human health and the environment from contaminants identified in the ROD because:

- Contaminated soils and sediments previously identified at SEAD-25 to contain aromatic volatile organic compound and cPAHs have been excavated and disposed at licensed and approved off-site landfills where they are being managed in controlled and monitored environments.

- The open excavations were allowed to backfill with contaminated groundwater from the immediate vicinity of the excavation sites, and then this water was pumped from the excavation site, placed into storage vessels, sampled and analyzed, approved for disposal and then disposed at a wastewater treatment plant where treatment was performed in accordance with applicable environmental limitations.

- The open excavations were then backfilled with approved soil meeting required cleanup goals, and then a vegetative cover over the disturbed site was re-established.

- A post-remedial action groundwater monitoring program was also implemented at SEAD-25, and data collected from the monitoring program indicates that concentrations of groundwater contaminants identified prior to the remedial action have fallen to levels significantly below pre- remedial action concentrations, but continue to show periodic evidence of being above identified groundwater quality criteria in two wells. However, the data collected from the ongoing monitoring program show no evidence of migration.

- Access to and use of groundwater continues to be restricted.

- The integrity of the monitoring well network present at SEAD-25, where the LTM continues, is being monitored and maintained.

- The results of the continuing LTM must not provide evidence that VOC concentrations are increasing back toward pre-removal action levels, or that the existing groundwater plume is expanding in size, or migrating into previously unaffected areas.

The selected remedy is still protective of human health and the environment with respect to contaminants identified in the ROD. The investigation of SEAD-25 for PFAS is ongoing at this time. However, groundwater restrictions are in place at the site and will continue to remain in place while PFAS investigations continue. The investigation shows early indicators of potential issues related to PFAS in groundwater at SEAD-25. SEAD-25 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs outside of the presence of PFAS; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy because the site is currently uninhabited and unoccupied. LUCs are in place that prohibit the unrestricted use of SEAD-25 and prohibit the use of groundwater.

Cleanup levels were set forth for COCs in soil and groundwater. For soil, the cleanup levels NYS SCO values contained in TAGM #4046 (NYSDEC 1996). The soil cleanup levels were compared to the EPA residential and industrial soil RSLs and NYSDEC SCOs to evaluate changes to toxicity data. **Table H.5.1** presents this comparison. While residential use is restricted for SEAD-25, residential RSLs and unrestricted SCOs are presented for comparison only. A majority of the cleanup levels are below either the EPA RSLs or the NYSDEC SCOs. All cleanup levels are below the EPA industrial soil RSL, except for naphthalene. The naphthalene industrial soil RSL is based upon a cancer risk of $1x10^{-6}$. The cleanup level for naphthalene is only about 2 times the RSL, which reveals that cancer risks are within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}. Additionally, all cleanup levels are below the NYSDEC restricted use SCOs. LUCs are in place for SEAD-25 to prevent unrestricted use and exposures at the site and only allow commercial/industrial uses. Therefore, the soil cleanup levels are still valid and protective.

SEAD-25 is undergoing active groundwater LTM. The screening levels and cleanup levels are reviewed and updated in the Annual LTM report (USACE 2026b). In the latest report, groundwater concentrations were compared against NYS WQS Class GA (6 CRR-NY 703.5) or, if not available, EPA RSLs (TR=1E-06, THQ=0.1, November 2024) for tap water. **Table H.5.2** presents the NYS AWQS. As shown in **Table H.5.2**, the NYS AWQS have not changed since the time of the remedy, and the cleanup levels in the ROD are protective. As a result, the cleanup levels and RAOs from earlier RODs are considered still valid. Since the standards are reviewed on an annual basis and updated as needed the cleanup standards remain protective of human health.

As noted, PFAS have been detected at SEAD-25 in soil, groundwater, and surface water. Federal and state MCLs are now available for PFOS and PFOA, and many detections at SEAD-25 exceeded those MCLs. PFAS investigations are currently ongoing and impacts to site soil, groundwater, and surface water will be determined. The remedy remains protective in the short-term because LUCs placed on SEAD-25 limit unrestricted use and exposure receptors and use of groundwater. Additionally, the site is uninhabited and unoccupied, so current exposures are not occurring.

377 **Table H.5.1 Comparison of Toxicity Data and Cleanup Levels in Soil**

Contaminants of Concern Listed in ROD	Cleanup Value in ROD (1)	Comparison of Screening Levels		Comparison of Potential Cleanup Levels	
		Current Federal Screening Level (Residential Use)(2)(4)	Current Federal Screening Level (Industrial Use)(2)	Current NYSDEC Soil Cleanup Objectives (Unrestricted Use)(3)(4)	Current NYSDEC Soil Cleanup Objectives (Restricted Use)(3)
Volatile Organic Compounds					
1,1,1-Trichloroethane	0.8	810	3,600	0.68	500
1,1-Dichloroethane	0.2	3.6	16	0.27	240
Benzene	0.06	1.2	5.1	0.06	20
Chloroform	0.3	0.32	1.4	0.37	180
Ethyl Benzene	5.5	5.8	25	1	390
Toluene	1.5	490	4,700	0.7	500
Trichloroethene	0.7	0.41	1.9	0.47	54
Xylene (total)	1.2	55	250	0.26	500
Semivolatile Organic Compounds					
2-Methylnaphthalene	36.4	24	300	--	--
Naphthalene	13	2	8.6	12	500
Phenol	0.03	1,900	25,500	0.33	500

378
379 Notes:
380 (1) Cleanup levels presented in the table originate from the site-specific ROD
381 (2) Federal soil screening values are EPA RSLs for Residential and Industrial Soil based on a risk level – 1E-06 or target HQ = 0.1; November 2024.
382 (3) State soil cleanup goals are from 6 CRR-NY 375-6.8 (b); Updated 31 December 2025.
383 (4) Only the industrial criteria is used to evaluate remedy protectiveness.
384 "--" Indicates no criteria or not applicable
385 Units are in milligrams per kilogram (mg/kg)
386

Table H.5.2 Comparison of Toxicity Data and Cleanup Levels in Groundwater

Contaminants of Concern Listed in ROD	Cleanup Level in ROD (1)	Current NYSDEC Groundwater Cleanup Objectives (Class GA)(2)	Are the newly promulgated cleanup goals less than those used in the ROD? (Y/N)
Volatile Organic Compounds			
1,1,1-Trichloroethane	5	5	N
1,1-Dichloroethane	5	5	N
1,2-Dichloroethene	5	5	N
Benzene	1	1	N
Chloroform	7	7	N
Ethyl Benzene	5	5	N
Toluene	5	5	N
Trichloroethene	5	5	N
Xylene (total)	5	5	N
Semivolatile Organic Compounds			
2-Methylphenol	1	1	N
2,4-Dimethylphenol	1	1,000	N
3',3'-Dichlorobenzidine	5	5	N
4-Methylphenol	1	1	N
Phenol	1	1	N

Notes:
1) Cleanup levels presented in the table originate from the site-specific ROD
2) NYSDEC AWQS for Class GA waters. From 6 NYCRR Parts 701-705.
"--" Indicates no criteria or not applicable
Units are in micrograms per liter (µg/L)

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

The investigation of SEAD-25 for PFAS is ongoing at this time. The investigation shows early indicators of potential issues related to PFAS in groundwater at SEAD-25. The remedy in place is for the contaminants identified in the ROD, which did not include PFAS as this contaminant had not been known at the time of the ROD. Further investigation is underway to determine if a remedy is needed for PFAS at this site.

According to the data reviewed and the site inspection, the current remedy is functioning as intended by the RODs for SEAD-25 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

A remaining issue at SEAD-25 is the detection of PFAS in groundwater, soil, and surface water which warranted further PFAS investigation. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Continue LTM groundwater monitoring until site COC concentrations decline below the NYS GA cleanup standard.
- Continue ongoing PFAS investigation.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

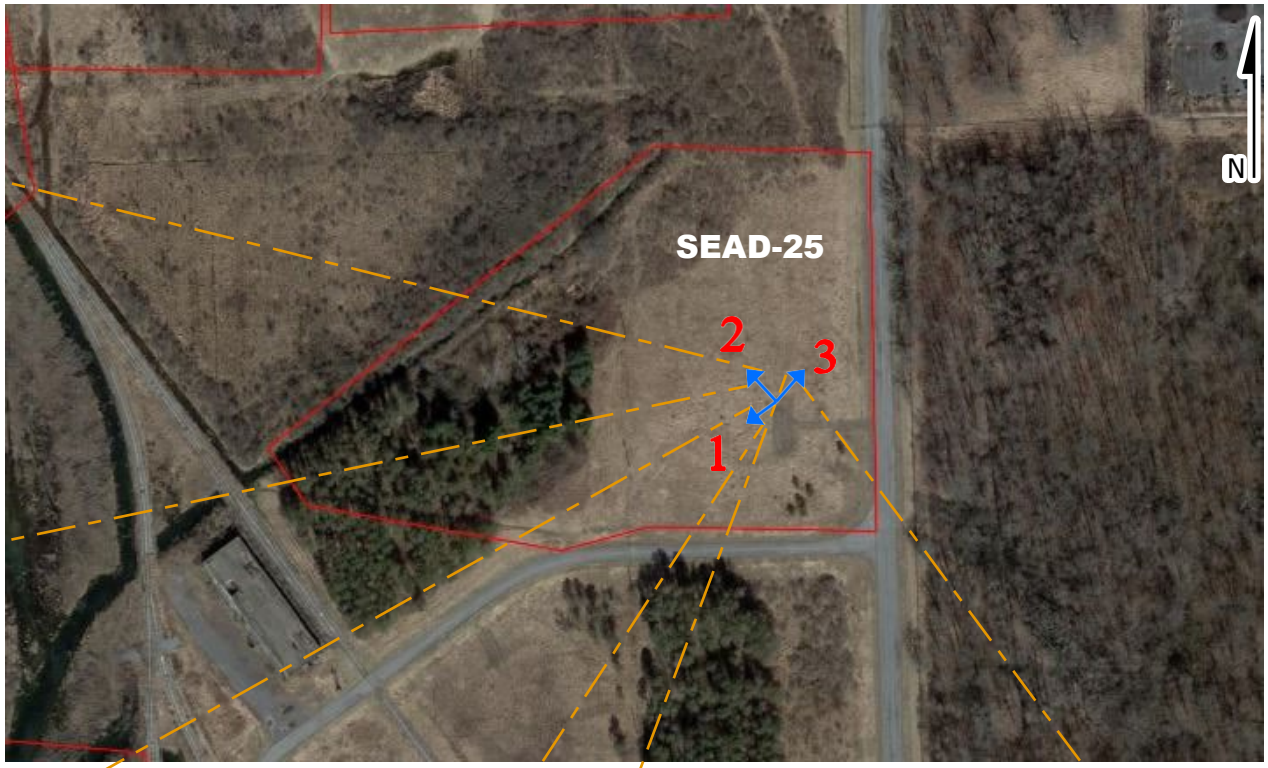
The remedy implemented for PID/Warehousing Areas is protective of the environment and human health in the short-term. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years. PFAS are a concern at this site and is currently undergoing investigation; however, SEAD-25 is located within the PID area, within which, an environmental easement and deed restriction prohibits both residential use and the use of groundwater.

Attachment 1

Photographic Log



25-2

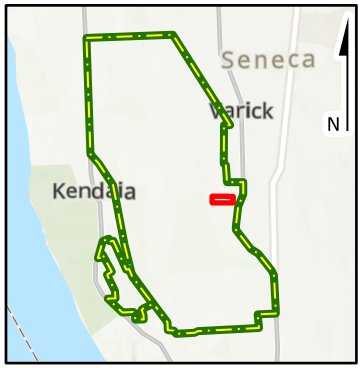




25-1



25-3



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-25
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 25	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Attachment 3

SEAD-25 Site Features



\\syracusefn\Syracuse\GISdata\Federal\Seneca_Army_Depot\PROJECTS\ArcPro_(aprx)\SEAD25_Report_2025\SEAD25_Report_2025.aprx



Legend

- Former Seneca Army Depot Boundary
- SEAD-25 Boundary
- Excavated Area
- Swale
- Drainage
- Surface Water Flow Direction
- Gauge Only
- LTM Sampling Annually, for 5 years
- LTM Sampling Every 5 years, starting in 2025

SEAD-25 Site Features

Seneca Army Depot (SEAD)
Romulus, Seneca County, New York

Map Date: 8/13/2025
Projection: NAD83 State Plane
New York Central (in feet)

Appendix I

SEAD-26: Fire Training Pit and Area

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APPENDIX I: SEAD-26 FIRE TRAINING PIT AND AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Fire Training Pit (SEAD-26) site is located in the southeastern portion of SEAD. The site is bounded to the east and west by SEAD railroad tracks; on the south by grassland and low brush; and on the north by 7th Street.

SEAD-26 was in use from 1977 to 1994. The pit was approximately 75 feet in diameter and approximately 3 feet deep. A bentonite liner was installed in the pit in 1982 or 1983. The pit was used one to four times a year for firefighting training during which time various flammable materials were floated on water, ignited, and extinguished. Prior to 1977, the fire training area surrounding the pit may have also been used for fire demonstrations (USACE 2004b).

In 2017, USACE launched an SI at three previously investigated sites (SEAD-25, SEAD-26, and SEAD-122E), which were formerly used as fire training areas, to determine whether the sites were impacted with PFAS. The data from the SI showed that the concentrations of the two primary PFAS constituents, PFOA and PFOS, were measured in exceedance of the EPA HA levels in four of the eight wells sampled at SEAD-26. As a result, SEAD-26 proceeded to an ESI with a focus on further delineating the PFAS extents in the area (USACE 2018). The results from the ESI indicate that SEAD-26 is a primary source area for PFAS. Groundwater results indicate that PFAS were detected within the upper water bearing zone (overburden) with little impacts to the lower water bearing zone (bedrock). Source areas soils likely contribute to elevated concentrations of PFAS above the PALs to groundwater through leaching. Surface water concentrations within the AOCs and downgradient are impacted with PFAS. SEAD-26 exhibits PFAS signatures consistent with former AFFF use; however, the signatures are not consistent between other PFAS impacted sites (SEAD-25) suggesting the use of various formulations of AFFF over the site history or potentially different environmental conditions which are affecting the fractionation of the various individual PFAS differently (USACE 2022). Currently, the remedy in place for SEAD-26 is for the contaminants identified in the ROD, which did not include PFAS as this contaminant had not been known at the time of the ROD. There are no known completed groundwater exposure pathways at these sites. SEAD-25 and SEAD-26 are currently being investigated as part of a PFAS RI at the site. Further investigation is underway to determine if a remedy is needed for PFAS at these sites. The RI is intended to further characterize potential PFAS sources and potential pathways for contaminant migration near the suspected source areas. RI outcomes are not final at the time of this review.

Initial Response

SEAD-26 is described in three reports before the RI. The first report was the Work Plan for CERCLA ESI of 10 SWMUs (USACE 1993). This report detailed the site work and sampling performed under the ESI. The second report was a SWMU Classification Report (USACE 1994a), which was undertaken to describe and evaluate the SMWU at SEAD. The third was an ESI Report (USACE 1995b), which described a more detailed investigation of SEAD-26. The fieldwork for the ESI was conducted according to the Work Plan for CERCLA ESI of 10

SWMUs. Based on the results of the ESI, a RI Work Plan was prepared, and the RI field program was conducted. An RI and FS were completed for SEAD-25/26 in May 1998 and October 1998, respectively.

Basis for Taking Action

Due to human health risk in soil and groundwater an action was required at SEAD-26 to ensure land use remains protective of site users. SEAD-26 is part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

At SEAD-26, the primary contaminants detected included SVOCs and metals in the soil and sediments. In addition, low levels of volatiles were also detected in the groundwater at levels above NYSDEC GA Standards. However, the contaminants that exceeded NYSDEC GA Standards in the groundwater were no longer found in the soil of SEAD-26 due to attenuation of the contaminants in the soil (USACE 1998a).

PFOA and PFOS are being investigated as part of an RI. These constituents were identified after the ROD was completed. The investigation of SEAD-26 for PFAS is ongoing at this time.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-26 there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors except for the future residential child (HI=1.3) are less than 1.0. The child receptor under the future residential scenario had a HI that slightly exceeded the target value due to dermal contact with groundwater and ingestion of site soils with cPAHs and arsenic.

The results of the ecological risk assessment presented in the RI Report (USACE 1998a) concluded that there was negligible risk to the ecosystems of SEAD-26 study area. During the field evaluation, no overt acute toxic impacts were noted. The quantitative ecological risk evaluation determined that a possibility exists for the COPCs (SVOCs) to present a small potential for environmental effects to terrestrial receptors and aquatic-amphibian population due to sediment, soil, and surface water at SEAD-26. At SEAD-26, terrestrial receptors were mostly affected by COPCs in the soil.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *The Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD-26)* (USACE 2004b) required the following remedies and establishment of ICs at SEAD-26. The preferred remedy consisted of the following elements:

- Excavate surface soils with total cPAH concentrations above 10 ppm, for an estimated total of 1,050 cy

- Dispose of excavated soils in an appropriate off-site facility
- Conduct groundwater monitoring until the groundwater cleanup standards are met in order to ensure that the VOCs present do not migrate off-site
- Establish and maintain groundwater use controls to restrict groundwater access and use until cleanup standards are achieved
- Complete a review of the selected remedy every 5 years (at minimum), in accordance with Section 121(c) of the CERCLA
- Prepare a contingency plan that may include additional monitoring and air sparging of the plume, as necessary, which would protect against VOC contamination migrating offsite
- Remove groundwater use restrictions once groundwater cleanup standards are achieved
- Establish and maintain LUCs to:
  - Prevent access to or use of the groundwater until cleanup levels are met
  - Prevent residential housing, elementary and secondary schools, childcare facilities and playgrounds activities
  - Maintain the integrity of any current or future remedial or monitoring system

Remedy Implementation

The CCR (USACE 2006a) for the Fire Training and Demonstration Pad (SEAD-25) and the Fire Training Pit and Area (SEAD-26), describes remedial action activities at SEAD-26 and presents sample collection and laboratory test results, record survey data, record (as-built) drawings, and photo documentation to demonstrate compliance with the requirements set forth by the ROD (USACE 2004b) and the RD Work Plan and Design Report (USACE 2005d).

The initial excavation at SEAD-26 began on 9 November 2005 and was completed on 15 November 2005. Five distinct areas at SEAD-26 were excavated to a depth of 1 foot bgs, and a total of 828 cy (1,248 tons) of soil was excavated and disposed offsite. Confirmatory soil samples were collected from the perimeter and the base of each of the five excavation areas and were analyzed for cPAHs. The edges of the five excavation areas were smoothed. All confirmatory samples representative of soil remaining onsite met the soil cleanup goals. Additional remediation of soils at SEAD-26 was not required.

SEAD-25 and SEAD-26 Soil Removal Cleanup Goals		
Analyte	**Cleanup Goal (µg/Kg)**	**Goal Met?**
Volatile Organic Compounds		
1,1,1-Trichloroethane	800	Yes
1,1-Dichloroethane	200	Yes
Benzene	60	Yes
Chloroform	300	Yes
Ethyl Benzene	5,500	Yes
Toluene	1,500	Yes
Trichloroethene	700	Yes
Xylene (total)	1,200	Yes
Semivolatile Organic Compounds		
2-Methylnaphthalene	36,400	Yes
Naphthalene	13,000	Yes
Phenol	30	Yes
cPAHs (SEAD-26 only)		
cPAHs (BTE)*	10	Yes

Notes:
*cPAHs were only sampled at SEAD-26 and were compared to the Benzo(a)pyrene Toxicity Equivalence. NYSDEC TAGM values from Technical and Administrative Guidance Memorandum HWR-92-4046, 24 January 1994

LTM was conducted beginning in 2007; however, groundwater monitoring at SEAD-26 was terminated by USACE, with the approval of the EPA and the NYSDEC, after the first year of sampling and analysis indicated that no COCs were present in the groundwater at concentrations above defined cleanup goals.

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006) implemented LUCs for the PID/Warehouse Area. Addendum 1 to the SEAD LUC RD added SEAD 25, and 26 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-26) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-26 is presented in **Table I.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-26 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table I.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Prevent access or use of the groundwater until New York States GA groundwater Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
Monitoring Well Network	Yes	Yes	SEAD-26	Maintain the integrity of any current or future remedial or monitoring system.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table I.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table I.3.2**).

Table I.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-26	Protective	The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table I.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-26	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	NA
SEAD-26	NA	Continued PFAS investigation.	Completed	ESI was completed in 2022. An RI for PFAS is ongoing at SEAD-26.	Ongoing

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-26 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-26.
- No apparent access to or use of groundwater observed at SEAD-26.

Interviews

Since SEAD-26 is uninhabited and unoccupied, no interviews were conducted during the FYR.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-26 currently protects human health and the environment from contaminants identified in the ROD because:

- Contaminated soils and sediments previously identified at SEAD-26 to contain aromatic VOCs and cPAHs have been excavated and disposed at licensed and approved off-site landfills where they are being managed in controlled and monitored environments.

- The open excavations were allowed to backfill with contaminated groundwater from the immediate vicinity of the excavation sites, and then this water was pumped from the excavation site, placed into storage vessels, sampled and analyzed, approved for disposal and then disposed at a wastewater treatment plant where treatment was performed in accordance with applicable environmental limitations.

- The open excavations were then backfilled with approved soil meeting required cleanup goals, and then a vegetative cover over the disturbed site was re-established.

- A post-remedial action groundwater monitoring program was also implemented at SEAD-26 (Fire Training Area Pit), and data collected during the first year of quarterly monitoring indicated that contaminants identified as being of concern in the groundwater prior to the remedial action were no longer present at concentrations in excess of groundwater standards. As a result of this finding, USACE requested regulatory approval to terminate groundwater monitoring at SEAD-26; this request was approved by both EPA and NYSDEC.

- Access to and use of groundwater continues to be restricted.

The selected remedy is still protective of human health and the environment with respect to contaminants identified in the ROD. The investigation of SEAD-26 for PFAS is ongoing at this time. However, groundwater restrictions are in place at the site and will continue to remain in place while PFAS investigations continue. The investigation shows early indicators of potential issues related to PFAS in groundwater at SEAD-26. No significant changes in site conditions have been noted over the last three FYRs outside of the presence of PFAS; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy because the site is currently uninhabited and unoccupied. LUCs are in place that prohibit the unrestricted use of SEAD-26 and prohibit the use of groundwater.

Cleanup levels were set forth for COCs in soil and groundwater. For soil, the cleanup levels NYS SCO values contained in TAGM #4046 (NYSDEC 1994). The soil cleanup levels were compared to the EPA residential and industrial soil RSLs and NYSDEC SCOs to evaluate changes to toxicity data. **Table I.5.1** presents this comparison. While residential use is restricted for SEAD-26, residential RSLs and unrestricted SCOs are presented for comparison only. A majority of the cleanup levels are below either the EPA RSLs or the NYSDEC SCOs. All cleanup levels are below the EPA industrial soil RSL, except for naphthalene. The naphthalene industrial soil RSL is based upon a cancer risk of $1x10^{-6}$. The cleanup level for naphthalene is only about 2 times the RSL, which reveals that cancer risks are within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}. Additionally, all cleanup levels are below the NYSDEC restricted use SCOs. LUCs are in place for SEAD-26 to prevent unrestricted use and exposures at the site and only allow commercial/industrial uses. Therefore, the soil cleanup levels are still valid and protective.

SEAD-26 is undergoing active groundwater LTM. The screening levels and cleanup levels are reviewed and updated in the Annual LTM Report (USACE 2026b). In the latest report, groundwater concentrations were compared against NYS AWQS Class GA (6 CRR-NY 703.5) or, if not available, EPA RSLs (TR=1E-06, THQ=0.1, November 2024) for tap water. **Table I.5.2** presents the NYS AWQS. As shown in **Table I.5.2**, the NYS AWQS have not changed since the time of the remedy, and the cleanup levels in the ROD are protective. As a result, the cleanup levels and RAOs from earlier RODs are considered still valid. Since the standards are reviewed on an annual basis and updated as needed the cleanup standards remain protective of human health.

As noted, PFAS have been detected at SEAD-26 in soil, groundwater, and surface water. Federal and state MCLs are now available for PFOS and PFOA, and many detections at SEAD-26 exceeded those MCLs. PFAS investigations are currently ongoing and impacts to site soil, groundwater, and surface water will be determined. The remedy remains protective in the short-term because LUCs placed on SEAD-26 limit unrestricted use and exposure receptors and use of groundwater. Additionally, the site is uninhabited and unoccupied, so current exposures are not occurring.

281 **Table I.5.1 Comparison of Toxicity Data and Cleanup Levels in Soil**

Contaminants of Concern Listed in ROD	Cleanup Value in ROD [1]	Comparison of Screening Levels		Comparison of Potential Cleanup Levels	
		Current Federal Screening Level (Residential Use)[2]	Current Federal Screening Level (Industrial Use)[2]	Current NYSDEC Soil Cleanup Objectives (Unrestricted Use)[3]	Current NYSDEC Soil Cleanup Objectives (Restricted Use)[3]
Volatile Organic Compounds					
1,1,1-Trichloroethane	0.8	810	3,600	0.68	500
1,1-Dichloroethane	0.2	3.6	16	0.27	240
Benzene	0.06	1.2	5.1	0.06	20
Chloroform	0.3	0.32	1.4	0.37	180
Ethyl Benzene	5.5	5.8	25	1	390
Toluene	1.5	490	4,700	0.7	500
Trichloroethene	0.7	0.41	1.9	0.47	54
Xylene (total)	1.2	55	250	0.26	500
Semivolatile Organic Compounds					
2-Methylnaphthalene	36.4	24	300	--	--
cPAHs (benzo(a)pyrene)	0.01	0.11	2.1	1	3.7
Naphthalene	13	2	8.6	12	500
Phenol	0.03	1,900	25,500	0.33	500

282 Notes:
283 1) Cleanup levels presented in the table originate from the site-specific ROD
284 2) Federal soil screening values are EPA RSLs for Residential and Industrial Soil based on a risk level – 1E-06 or target HQ = 0.1; November 2024.
285 3) State soil cleanup goals are from 6 CRR-NY 375-6.8 (b); Updated 31 December 2025.
286 "--" Indicates no criteria or not applicable
287 Units are in milligrams per kilogram (mg/kg)
288

289 **Table H.5.2 Comparison of Toxicity Data and Cleanup Levels in Groundwater**

Contaminants of Concern Listed in ROD	Cleanup Level in ROD[(1)]	Current NYSDEC Groundwater Cleanup Objectives (Class GA)[(2)]	Are the newly promulgated cleanup goals less than those used in the ROD? (Y/N)
Volatile Organic Compounds			
1,1,1-Trichloroethane	5	5	N
1,1-Dichloroethane	5	5	N
1,2-Dichloroethene	5	5	N
Benzene	1	1	N
Chloroform	7	7	N
Ethyl Benzene	5	5	N
Toluene	5	5	N
Trichloroethene	5	5	N
Xylene (total)	5	5	N
Semivolatile Organic Compounds			
2-Methylphenol	1	1	N
2,4-Dimethylphenol	1	1,000	N
3',3'-Dichlorobenzidine	5	5	N
4-Methylphenol	1	1	N
Phenol	1	1	N

290 Notes:
291 1) Cleanup levels presented in the table originate from the site-specific ROD
292 2) NYSDEC AWQS for Class GA waters. From 6 NYCRR Parts 701-705.
293 "--" Indicates no criteria or not applicable
294 Units are in micrograms per liter (µg/L)
295
296

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

The investigation of SEAD-26 for PFAS is ongoing at this time. The investigation shows early indicators of potential issues related to PFAS in groundwater at SEAD-26. The remedy in place is for the contaminants identified in the ROD, which did not include PFAS as this contaminant had not been known at the time of the ROD. Further investigation is underway to determine if a remedy is needed for PFAS at this site.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-26 and the PID Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

A remaining issue at SEAD-26 is the detection of PFAS in groundwater, soil, and surface water which warranted further PFAS investigation. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Continue ongoing PFAS investigation.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID Warehousing Areas is protective of the environment and human health in the short-term. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

326

327 *This page intentionally left blank*

Attachment 1

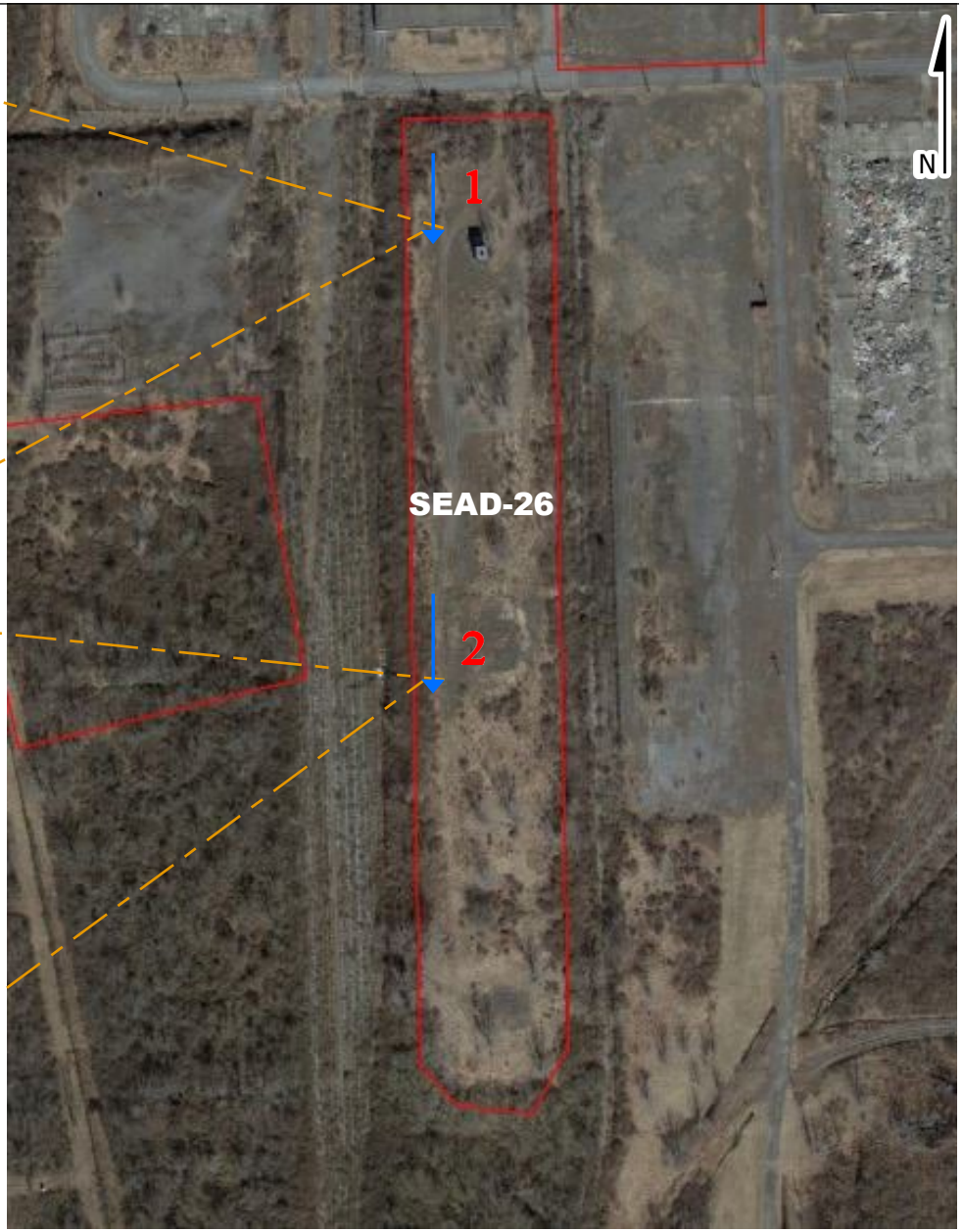
Photographic Log



26-1



26-2





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-26
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 26	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20 F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds.
No apparent groundwater use.

Observations:

Current Land Use

Vacant Building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix J

SEAD-27: Building 360, Steam Jenny Pit

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APPENDIX J: SEAD-27 BUILDING 360, STEAM JENNY PIT

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

Building 360 is located in the eastern-central portion of SEAD. The building was used for refurbishing and reconstructing old equipment. Lathes, presses, and metal-working machines were degreased with steam, high- pressure water and detergents in the cleaning area. No solvent materials were ever used in the cleaning operation. After steam cleaning, the equipment was moved to other portions of Building 360 for rehabilitation.

The Steam Jenny Accumulation Pit (SEAD-27) is located within a high bay area of Building 360 that is located near the north end of the building and is separated from the remainder of the building by cinder block walls. The steam cleaning waste tank is a belowground, concrete tank above which track-mounted cars loaded with equipment requiring cleaning can be positioned and steam cleaned. Use of the Steam Cleaning Waste Tank began in 1976, and cleaning operations ceased on 2 January 1990.

Initial Response

A closure investigation was performed under the RCRA program in July of 1995, and the determination was made that the accumulation pit in Building 360 satisfied the RCRA requirements for clean closure (USACE 2004d). More details of these activities can be found in the Building 360 Closure report. The results of the chemical analyses can be found in the Mini Risk Assessment – Appendix B, Tables B-1 and B-2 (USACE 2002a) for soil and groundwater, respectively. Monitoring of the water elevation in the waste tank and the removal of accumulated water (if present) ceased once RCRA closure was completed and certified.

Basis for Taking Action

Due to human health risk in groundwater, an action was required at SEAD-27 to ensure land use remains protective of site users. SEAD-27 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

The RCRA Closure Work Plan required testing of all potential contaminants found at the site during the operation of the Steam Jenny Tank. Therefore, soil and groundwater samples were collected and analyzed for VOCs, PCBs, cadmium, chromium, and lead. Groundwater samples were also analyzed for SVOCs. No compounds of concern were detected in SEAD-27 soils. Acetone and naphthalene were detected in groundwater; however, at the time no NYS Class GA groundwater quality standards existed for these compounds. If the site were to be used as a residential area, the human health risk assessment determined that an LUC on groundwater use would be necessary.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-27 under an industrial scenario there are no human health cancer risks above the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6}, and the calculated non-cancer HI for all receptors except for the day care center child (HI=3) are less than 1.0. Maximum site concentrations were used as the exposure EPCs for SEAD-27. The elevated HI for the day care center child was due solely to ingestion of groundwater, with naphthalene, acetone and chromium being the significant risk contributors.

A risk assessment was also conducted for a residential scenario. The total cancer risk from all exposure routes was within or below the EPA target range for both receptors (adult resident and child resident). The total non- cancer HI from all exposure routes exceeded one for the adult resident (HI=2) and the child resident (HI=7). The elevated HI for the adult was due solely to ingestion of groundwater and the elevated HI for the child was due to ingestion of groundwater and dermal contact of groundwater. Naphthalene and acetone were the significant risk contributors.

Based on the data, should SEAD-27 be used as a residential area, it would be necessary to place an LUC on groundwater use. This would restrict the use of groundwater as a drinking water source, preventing exposure to groundwater. This restriction results in the non-cancer HI being less than 1 for both child and adult receptors. No COCs were detected in SEAD-27 soils.

An ecological risk assessment was not performed for SEAD-27 due the lack of ecological receptors.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004a) required the establishment of the following ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained at SEAD-27.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to or use of groundwater until UU/UE criteria is attained.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the PID/Warehouse Area. This SEAD LUC RD exempted 14 sites, or parcels, identified as USACE Retained Sites.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-27) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-27 is presented in **Table J.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-27, as part of the "PID Retained Parcels," was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table J.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table J.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table J.3.2**).

Table J.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-27	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table J.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-27	N/A	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025 and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed	N/A
SEAD-27	N/A	Collect new groundwater samples and perform a site-specific risk assessment to determine if Class GA standards can be met in groundwater at SEAD-27.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-27 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-27.

- No apparent access to or use of groundwater was observed at SEAD-27.

Interviews

Since SEAD-27 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-27.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-27 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the AOC, within the PID Area of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds for all land within the PID Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-27. SEAD-27 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed.

However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2004). The risk assessment did determine potential risk concerns for residential use. However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. Additionally, potential risk concerns were associated with groundwater use as a tap water supply. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-27 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

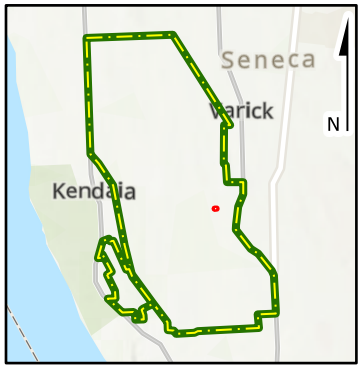
Attachment 1

Photographic Log





27-1



Legend

- Former Depot Boundary
- Photo Viewing Direction

SEAD-27
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 27	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20 F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. No apparent groundwater use.

Observations:

Current Land Use

Vacant building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix K

SEAD-64A: Garbage Disposal Area

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APPENDIX K: SEAD-64A GARBAGE DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-64A is located in the east-central portion of SEAD. The site is bounded to the north by a square storage pad, to the east by the SEAD railroad tracks beyond which is the area where the Fire Training Site (SEAD-26) is located, and to the south and west by undeveloped grassland. SEAD-64A was used during the period from 1974 to 1979 when the on-site solid waste incinerator was not in operation. The types of waste disposed of at the site are suspected to be primarily household items (USACE 2002a).

Initial Response

A field investigation was conducted at SEAD-64A beginning in February 1994 as part of the ESI for Seven Low Priority AOCs (USACE 1996). A geophysical survey was conducted, and soil and groundwater samples were collected and submitted for analysis.

Basis for Taking Action

Because of the human health risk due to soil and groundwater an action was required at SEAD-64A to ensure land use remains protective of site users. SEAD-64A is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas. The potential future hazards or risks identified at SEAD-64A are either suitable for the defined use or associated with compounds that are present at concentrations that are equal to or less than naturally occurring levels.

Contaminants of Concern

During the ESI sampling, aluminum, iron, manganese, and thallium were detected in groundwater at levels that exceeded their respective comparative criteria levels. Results are summarized in the ROD (USACE 2004d).

Several cPAHs (benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, indeno[1,2,3-cd]pyrene], phenol, and several metals (aluminum, arsenic, chromium, copper, lead, potassium, and zinc) were detected at levels that exceeded applicable TAGM 4046 soil cleanup objectives in one or more soil samples. In groundwater, aluminum, iron, manganese, and thallium were detected at levels that exceeded their respective comparative criteria levels (USACE 2004d).

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-64A under a warehouse land use scenario the human health cancer risks are within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0.

In addition, risks to residential receptors (i.e., residential adult and residential child) have been evaluated based on the 1994 soil and groundwater data. The total cancer risks are below or at the EPA upper target limit for all receptors. The total non-cancer HI from all exposure routes are equal to or greater than 1.0 for residential receptors. Groundwater ingestion is the only exposure route that would result in significant risk to residential receptors; however, the non-cancer hazard indices are overstated as the metal concentrations in groundwater were elevated due to the elevated turbidities in the groundwater samples.

The risk assessments were conducted for SEAD-64A based on the 1994 soil and groundwater data. The results of total cancer risk and total non-cancer hazard index can be found in Table 3.5-10 of the Final Decision Document – Mini Risk Assessment, Seneca Army Depot Activity (USACE 2002a).

An ecological risk assessment was also conducted to evaluate potential risks to deer mice, short-tailed shrews, and American robins posed by the COPCs detected in surface soils at SEAD-64A. The HQs estimated for all COPCs found in shallow soil were found less than 1 with the exception of benzo(a)pyrene, bis(2-ethylhexyl)phthalate, fluoranthene, and lead. The elevated risks driven by the listed compounds were associated with one surface soil sample. As a planned warehouse development, this site would most likely not support a balanced habitat. Based on the above discussion, it is concluded that SEAD-64A would not pose significant risk to potential ecological receptors. The results of the risk assessment are presented and described in detail within the Final Decision Document – Mini Risk Assessment, Seneca Army Depot Activity (USACE 2002a).

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004d) required the establishment of the following ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained within the AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

- Establishing, maintaining, monitoring, and reporting on a third LUC prohibiting digging within the bounds of the site will be established.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area.

An Environmental Easement for the PID/Warehousing Area was recorded in the Seneca County Clerk's office on 4 March 2008. A summary of the ICs currently implemented at SEAD-64A is presented in **Table K.2.1** based on the data and risk presented in the ROD and LUC RD .

SEAD-64A was transferred to the SCIDA with a Quitclaim Deed executed on 30 September 2005. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehousing Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table K.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes[(2)]	SEAD PID/ Warehousing Area	Restrict site use[(1)]	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
Subsurface	Yes	Yes	SEAD 64A Controlled Property	Prevent unauthorized excavation	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

Notes:

(1) Although cPAH levels that exceeded applicable TAGM 4046 soil cleanup objectives were identified in one or more soil samples, no risks associated with soil were identified. It was determined that groundwater ingestion is the only exposure route that would result in significant risk to residential receptors and SEAD-64A would not pose significant risk to potential ecological receptors.

(2) SEAD-64A is located within the PID/Warehouse Area where an area-wide IC is present. The IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although no risk was identified within the soil, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table K.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table K.3.2**).

Table K.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-64A	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table K.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-64A	NA	Continue the implementation of LUCs and the discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed	NA
SEAD-64A	NA	Re-visit the conclusions of the risk assessment to demonstrate that UU/UE can be met in soil at SEAD-64A.	Not completed	Discussion of the risk assessment for SEAD-64A in this report did not review whether UU/UE conditions were met.	
SEAD-64A	NA	Collect new groundwater samples and perform a site-specific risk assessment to determine if Class GA standards can be met in groundwater at SEAD-64A.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-64A was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-64A.
- No apparent use of groundwater was observed.
- No visual indications of digging or excavation were observed.

Interviews

Since SEAD-64A is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-64A.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial action section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 4 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-64A is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.
- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds for all land within the PID Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

- A third LUC that prevents unauthorized excavation at the SEAD 64A site alone has been implemented, monitored, and periodically reported upon.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-64A. SEAD-64A is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2004). The risk assessment did determine potential risk concerns for residential use. However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. Additionally, potential risk concerns were associated with groundwater use as a tap water supply. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-64A and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-64A, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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224 *This page intentionally left blank*

Attachment 1

Photographic Log





64A-2



64A-1



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-64A
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 64A	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds
No apparent groundwater use or access.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Erosion Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Adequate Signage?	☑ Yes	☐ No	☐ NA
If no, describe:			

II. Interviews

Appendix L

SEAD-66: Pesticide Storage Near Building 5 and 6

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APPENDIX L: SEAD-66 PESTICIDE STORAGE NEAR BUILDING 5 AND 6

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

Pesticides were reportedly stored in a structure located in the vicinity of Buildings 5 and 6 during active use of the SEAD. The Pesticide Storage Area near Buildings 5 and 6 (SEAD-66) is located in the east- central portion of SEAD. The exact location of the pesticide storage area is unknown.

Initial Response

A Limited Sampling Program was performed at SEAD-66 in December 1993. Surface soil samples collected from SEAD-66 were analyzed for Target Compound List pesticides according to the NYSDEC Contract Laboratory Program (CLP) Statement of Work (SOW). Results of the chemical analyses for soil can be found in the Final Decision Document – Mini Risk Assessment (Appendix Q, Table Q-1) (USACE 2002a).

Basis for Taking Action

Due to potential human health risk in groundwater which was not fully evaluated an action was required at SEAD-66 to ensure land use remains protective of site users. SEAD-66 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Nine soil samples were collected from SEAD-66. Two pesticides, 4,4'-dichlorodiphenyldichloroethylene (DDE) and 4,4'- dichlorodiphenyltrichloroethane (DDT) were both detected at levels exceeding TAGMs in sample SS66-8 that was taken from a depth of 0-0.2 feet. The soil data are presented in the ROD (USACE 2004d). No groundwater samples were collected.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-66 under an industrial scenario the human health cancer risks are within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0.

A risk assessment was also conducted for a residential scenario. The total cancer risk from evaluated exposure routes is within or below the EPA target range for the potential adult and child resident receptors. The total non-cancer HI exceeds 1.0 for the child resident. The elevated HI for the child receptor is due solely to ingestion of soil with 4,4'-DDT being the significant risk contributor.

However, the maximum concentration of 4,4'-DDT is an isolated outlier, suggesting that the value is indicative of an isolated "hot spot" of contamination instead of a systemic release. Therefore, based on these results the actual exposure to 4,4'-DDT would be much lower than was used in the risk assessment, as it is unlikely that the child receptor would be exposed only to a small section of the site containing only the highest concentrations. Therefore, 4,4'-DDT is not considered a COC in soil at this site for this exposure scenario.

An ecological risk assessment, which is described and presented in Section 3.0 of the Decision Document (USACE 2002a), was conducted at SEAD-66. No significant ecological risk was found.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004d) required the establishment of the following ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until UU/UE criteria are attained within the AOCs.

- Establishing, maintaining, monitoring, and reporting on a second LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for UU/UE.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area.

An Environmental Easement for the PID/Warehousing Area was recorded in the Seneca County Clerk's office on 4 March 2008. A summary of the ICs currently implemented at SEAD-66 is presented in **Table L.2.1** based on the data and risk presented in the ROD and LUC RD SEAD-66 was transferred to the SCIDA with a Quitclaim Deed executed on 30 September 2005. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table L.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	No(1)	Yes(3)	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Unknown	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

Notes:
(1) Results from the risk assessment determined that 4,4'-DDT is not considered a COC in soil at SEAD-66 (USACE 2004d).
(2) Groundwater samples were not collected and therefore, risk to human health from groundwater was not evaluated.
(3) SEAD-66 is located within the PID/Warehouse Area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although no risk was identified within the soil and risk is unknown with respect to groundwater, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table L.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table L.3.2**).

Table L.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-66	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table L.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-66	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed	NA
SEAD-66	NA	Re-visit the conclusions of the risk assessment to demonstrate that UU/UE can be met in soil at SEAD-66.	Not completed	Discussion of the risk assessment for SEAD-66 in this report did not review whether UU/UE conditions were met.	
SEAD-66	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-66.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-66 was inspected on 3 February 2026, to assess whether required LUCs imposed by approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-66.
- No apparent access to or use of groundwater was observed.

- The former building that encompasses SEAD-66 has been demolished and only a concrete slab remains. This does not affect the implemented remedy or violate the LUCs imposed at the site.

Interviews

Since SEAD-66 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-66.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 3 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at the SEAD-66 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the PID/Warehousing Area of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds for all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported annually.

The selected remedy is still protective of human health and the environment. The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-66. SEAD-66 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2004). The risk assessment did determine potential risk concerns for residential use. However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. Additionally, potential risk concerns were associated with groundwater use as a tap water supply. Groundwater use restrictions are in place for the site. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-66 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

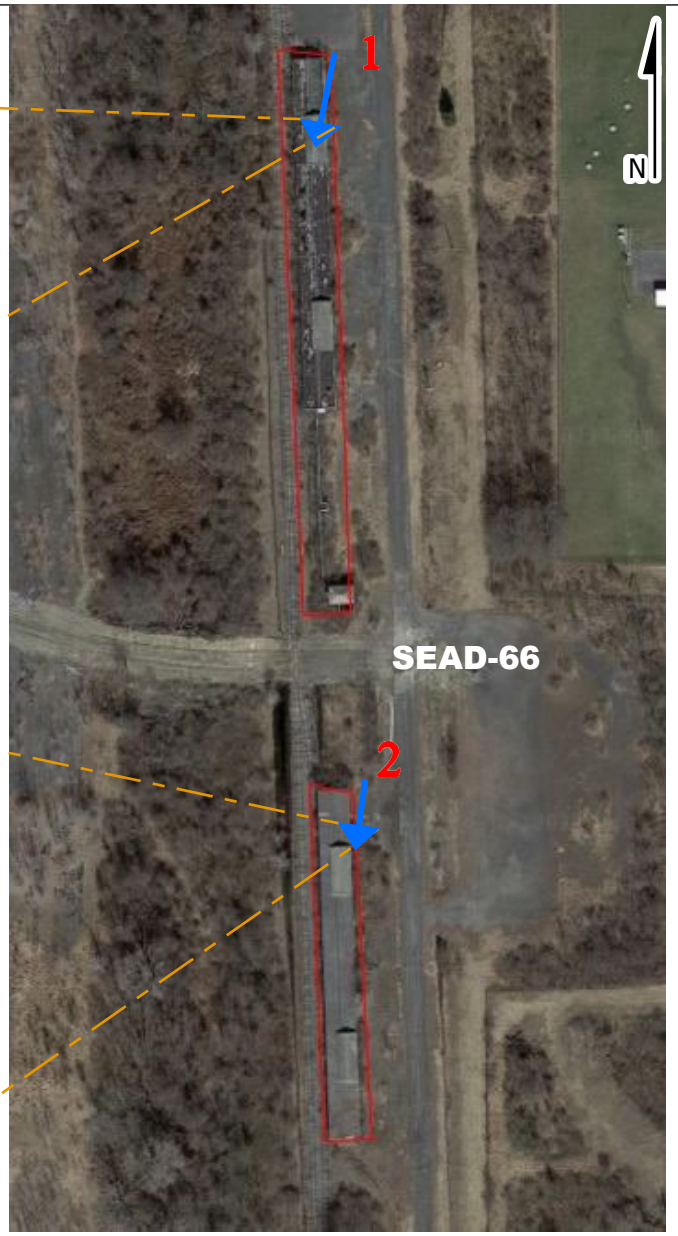
Photographic Log

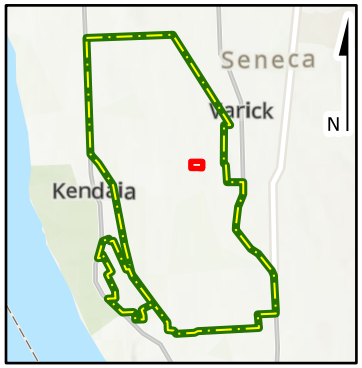


66-1



66-2





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-66
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 66	**Date of Inspection:**	02-03-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 23F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present.
No apparent groundwater use.
Northern buildings demolished, concrete slab remaining.

Observations:

Current Land Use
Vacant Building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:
No signage

II. Interviews

Appendix M

SEAD-39: Building 121 Boiler Blowdown Leach Pit

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APPENDIX M: SEAD-39 BUILDING 121 BOILER BLOWDOWN LEACH PIT

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

Building 121 is a boiler plant located in the administrative area of the former SEAD. SEAD-39 is the historical blowdown leaching area that was located exterior to, and immediately north of, Building 121. Use of the leaching area was terminated in 1979 or 1980 when boiler blowdown points within SEAD were connected to a sanitary sewer system (USACE 2007a).

Initial Response

Site work performed at SEAD-39 included a Limited Sampling Plan in 1993 and 1994 and a TCRA conducted in 2003, which included confirmatory sampling. The TCRA included excavating 34 tons of soil at SEAD-39 to a depth of 1 foot in August 2003 (USACE 2004e). The excavated area was backfilled and returned to its original grade. The north end of Building 121 and two paved roads helped define and limit the border of the excavation.

Following the TCRA excavation, surface soil samples were collected for chemical analysis of VOCs, PAHs, and metals, but none of the measured concentrations exceeded NYSDEC's TAGM soil cleanup objectives. Average concentrations of metals detected at this AOC were at levels consistent with SEAD site-wide background data. Based on the confirmatory and delineation samples, it was determined that further excavation would not be necessary at SEAD-39 (USACE 2002b).

Groundwater samples were not collected at SEAD-39.

Basis for Taking Action

Groundwater samples were not collected and therefore, risk to human health from groundwater was not evaluated. Due to human health risk in soil and potential risk in groundwater, which is unknown, an action was required at SEAD-39 to ensure land use remains protective of site users. SEAD-39 is part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Prior to connecting the boiler blowdown points to the sewer in 1979-1980, blowdown was reportedly released three times a day, and the discharged liquid was allowed to flow onto the ground at the blowdown point where it either infiltrated into the ground or flowed into the street. Each boiler was reported to have discharged between 400 and 800 gallons of blowdown liquids per day. The boiler blowdown was suspected to have contained water, tannins, caustic soda (sodium hydroxide), and sodium phosphate.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-39 the human health cancer risks were within or at the upper limit of the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0. The human health risk at SEAD-39 was evaluated using the 95th UCL value for each COC determined from the 15 sample confirmatory soil sample data set as the EPCs. These EPCs were then evaluated in RME scenario for receptors including an industrial worker, a construction worker, an adolescent trespasser, and a daycare center child. The results of the risk assessment indicate that HIs (non-carcinogenic risks) to all industrial receptors were below the EPA acceptable limits (i.e., HI of 1 or less). The cancer risk for the industrial worker, construction worker, and adolescent trespasser were each in EPA's targeted cancer risk range of 10^{-4} - 10^{-6} or less, while the cancer risk determined for the daycare center child was 1 x 10^{-4}.

An ecological risk assessment was not performed for SEAD-39.

REMEDIAL ACTIONS

Remedy Selection

The ROD (USACE 2007a) titled, *Seventeen No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)* for 17 sites includes LUCs as part of the remedy. This ROD refers to the LUCs documented in the *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004d) as being applied to the SEAD-39 AOC. These LUCs include:

- Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities

- Prohibit access to or use of groundwater until Class GA Groundwater Standards are met

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 2 to the SEAD LUC RD added SEAD 39, 40, and 67.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-39) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-39 is presented in **Table M.2.1** based on the data and risk presented in the ROD and the LUC ROD.

SEAD-39 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the

PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table M.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Unknown(1)	Yes	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

Notes:
(1) Groundwater samples were not collected and therefore, risk to human health from groundwater was not evaluated.
(2) SEAD-39 is located within the PID/Warehouse Area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although risk is unknown with respect to groundwater, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table M.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table M.3.2**).

Table M.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-39	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table M.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-39	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-39	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values) to determine if UU/UE conditions can be met in soil at SEAD-39.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-39	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-39.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-39 was inspected on 3 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-39.
- No apparent access to or use of groundwater were observed at SEAD-39.

Interviews

Since SEAD-39 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-39.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LTM Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-39 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the AOCs, within the PID Area of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds for all land within the PID Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-39. SEAD-39 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2007a). The risk assessment did not evaluate an unrestricted residential use but instead evaluated a potential daycare center child. Potential risk

concerns were identified for a daycare center child. However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. Groundwater was not evaluated as part of the SEAD-39 risk assessment; however, groundwater use restrictions are in place for the site as part of the sitewide PID/Warehouse Area. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-39 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

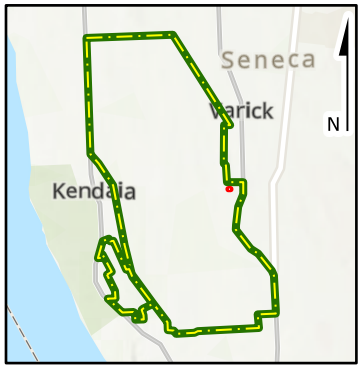
Attachment 1

Photographic Log



39-1





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-39
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 39	**Date of Inspection:**	02-03-2026
Location and Region:	Planned Industrial and Development Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 23F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities, and playgrounds present.
No apprenticeship groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Appendix N

SEAD-40: Building 319 Boiler Blowdown Leach Pit

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APPENDIX N: SEAD-40 BUILDING 319 BOILER BLOWDOWN LEACH PIT

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-40 is a boiler blowdown leach pit located north of Building 319, a boiler plant located on 1st Street in the east-central portion of SEAD. The historical blowdown leach pit that constitutes SEAD-40 was located in a drainage ditch next to the railroad tracks located north of Building 319. A drainage pipe originating in Building 319 is suspected to have carried blowdown liquids to the drainage ditch, where they were released and allowed to flow onto the ground. The drainage ditch originated at the mouth of the drainage pipe approximately 30 feet northeast of Building 319 (USACE 2007a).

Initial Response

The investigative work at SEAD-40 included a Limited Sampling Plan in 1993 and 1994 followed by a TCRA conducted in 2002 and 2003. The TCRA was completed at SEAD-40 in August 2003, and approximately 39 tons of soil were removed. The impacted soil was excavated at one section to a depth of 1 foot bgs and at another section to a depth of 6 feet bgs. Eighteen post-excavation samples were analyzed for VOCs, PAHs, and metals (USACE 2004e). Additional confirmation and delineation samples were collected; the results of which determined that further excavation would not be necessary at SEAD-40 (USACE 2002b, 2007a). Groundwater samples were not collected at SEAD-40.

Basis for Taking Action

Groundwater samples were not collected and therefore, risk to human health from groundwater was not evaluated. Given that groundwater risk is unknown, an action was required at SEAD-40 to ensure land use remains protective of site users. SEAD-40 is part of the PID/Warehouse Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Prior to connecting the boiler blowdown points to the sewer in 1979-1980, blowdown was reportedly released three times a day, and the discharged liquid was allowed to flow onto the ground at the blowdown point where it either infiltrated into the ground or flowed into the nearby drainage ditch. Each boiler is reported to have discharged between 400 and 800 gallons of blowdown liquids per day. The boiler blowdown is suspected to have contained water, tannins, caustic soda (sodium hydroxide), and sodium phosphate.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-40 there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0. Data from the confirmatory sampling performed for the

TCRA provided the basis of a risk assessment that was performed to assess potential site risks at SEAD-40.

An ecological risk assessment was not performed for SEAD-40.

REMEDIAL ACTIONS

Remedy Selection

The ROD (USACE 2007a) titled, *Seventeen No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)* for 17 sites includes LUCs as part of the remedy. This ROD refers to the LUCs documented in the *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004d) as being applied to SEAD-40. These LUCs include:

- Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities

- Prohibit access to or use of groundwater until Class GA Groundwater Standards are met

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 2 to the SEAD LUC RD added SEAD 39, 40, and 67.

An Environmental Easement for the PID/Warehouse Area including properties that had been previously retained (including SEAD-40) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-40 is presented in **Table N.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-40 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehousing Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table N.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	No(1)	Yes(3)	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Unknown(2)	Yes(3)	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

Note:
1) Results from the 2003 TCRA determined that further excavation would not be necessary at SEAD-40 (USACE 2002b); 2007a).
2) Groundwater samples were not collected and therefore, risk to human health from groundwater was not evaluated.
3) SEAD-40 is located within the PID/Warehouse Area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although no risk was identified within the soil and risk is unknown with respect to groundwater, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table N.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table N.3.2**).

Table N.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-40	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table N.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-40	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-40	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values) to determine if UU/UE conditions can be met in soil at SEAD-40.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-40	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-40.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-40 was inspected on 4 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-40.
- No apparent access to or use of groundwater was observed at SEAD-40.

Interviews

Since SEAD-40 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-40.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial Actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LTM Reports, LUC RD, Environmental Easements, transfer deeds and FYR site visit conducted on 4 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-40 currently is protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the PID/Warehousing Area, Institutional, and Airfield Parcel of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds at all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-40. SEAD-40 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2007). The risk assessment did not evaluate an unrestricted residential use but instead evaluated a potential daycare center child. Potential risk concerns were NOT identified for any receptors. However, LUCs were placed on the site to

prohibit an unrestricted use and exposure scenario. Groundwater was not evaluated as part of the SEAD-40 risk assessment; however, groundwater use restrictions are in place for the site as part of the sitewide PID/Warehouse Area. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Any changes to land use that are prohibited in the RAOs would require a comparison of soil analytical data to the most current NYSDEC SCOs for unrestricted use at the time of changes. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-40 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

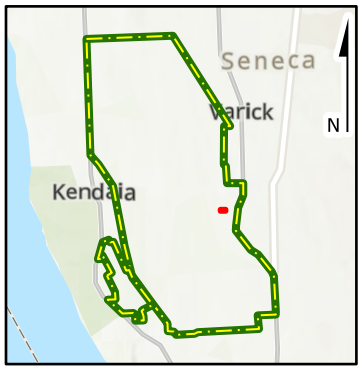
Attachment 1

Photographic Log





40-1



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-40
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 40	**Date of Inspection:**	02-04-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Active disposal of expired hand sanitizer at Adjacent building 318 (per EPA)

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities present.
No apparent groundwater use.

Observations:

Current Land Use

Vacant building/land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
Erosion Noted?	☐ Yes	☑ No	☐ NA
Adequate Signage?	☑ Yes	☐ No	☐ NA

If yes, describe:

If yes, describe:

If no, describe:

II. Interviews

Appendix O

SEAD-67: Dump Site East of Sewage Treatment Plant No. 4

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APPENDIX O: SEAD-67 DUMP SITE EAST OF SEWAGE TREATMENT PLANT NO. 4

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-67 (Dump Site East of Sewage Treatment Plant No. 4) is located in the central eastern portion of SEAD, immediately south of West Romulus Road and east of Sewage Treatment Plant No. 4 (SEAD-20). Five waste soil piles and two soil berms were formerly staged at the SEAD-67 site. The origin of the berms and waste piles is unknown.

Initial Response

Previous work at SEAD-67 included an ESI in 1993 and a TCRA from 2002 to 2004. Analytical results for the samples collected can be found in *Decision Document for Removal Actions at SWMUs SEAD-24, SEAD-50, SEAD-54, and SEAD-67* (USACE 2002c). The analytical results of the ESI provided the basis for conducting the TCRA at SEAD-67.

A TCRA to remove the waste soil was performed between 2002 and 2004 (USACE 2005b). The excavated soil was classified as non-hazardous soil for treatment and disposal. Subsequently, the TCRA expanded to include the removal of surface soil underlying and surrounding the locations of the former piles and berms. Surface soils were excavated to a depth of 12 inches. At the end of the TCRA, more than 1,300 cy of soil was removed from the SEAD-67 site. Due to the shallow nature of the final excavations, backfill was not used at SEAD-67; the sidewalls of the excavation were graded to smooth the contour differences between the original ground surface and the bottom of the excavation (USACE 2005b).

Basis for Taking Action

Due to the potential human health risk in groundwater which was not fully evaluated an action was required at SEAD-67 to ensure land use remains protective of site users. SEAD-67 is part of the PID/Warehousing Area and the planned future use for this tract of land is for industrial, office development, and/or warehouse areas.

Contaminants of Concern

Samples collected as part of the ESI were analyzed for VOCs, SVOCs, pesticides/PCBs, metals, and cyanide. Fifty (50) TCL/TAL compounds were detected in the soil samples, and 10 compounds, including 5 cPAHs and 5 metals, were detected at concentrations that exceeded their respective TAGM cleanup objective values. Compounds found at concentrations above applicable TAGM 4046 soil cleanup objectives included benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, dibenz(a,h)anthracene, calcium, lead, manganese, mercury, and potassium. Surface water results indicated that the unnamed stream near SEAD-67 has not been significantly impacted by contaminants. Available data indicated that the groundwater has not been significantly impacted by historical operations at SEAD-67 (USACE 2007a).

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-67 the human health cancer risks were within or below the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0. SVOC data from the confirmatory sampling performed for the TCRA provided the basis of the risk assessment and the 95th UCL of the mean was used as the EPC for each of the SVOC COCs. The human health risk assessment evaluated industrial (i.e., industrial worker, construction worker, daycare center child, daycare center worker) and residential (adult resident, child resident, and lifetime resident) receptors.

An ecological risk assessment was not performed for SEAD-67.

REMEDIAL ACTIONS

Remedy Selection

The ROD (USACE 2007a) titled, *Seventeen No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)* for 17 sites that include LUCs as part of the remedy. This ROD refers to the LUCs documented in the *Record of Decision for Sites Requiring Institutional Controls in the Planned Industrial/Office Development or Warehousing Areas* (USACE 2004d) as being applied to the SEAD-67 AOC. These LUCs include:

- Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities

- Prohibits access to or use of groundwater until Class GA Groundwater Standards are met

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 2 to the SEAD LUC RD added SEAD 39, 40, and 67.

An Environmental Easement for the PID/Warehousing Area including properties that had been previously retained (including SEAD-40) by USACE in 2008 was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-67 is presented in **Table O.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-67 as part of the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow UU/UE, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of

the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table O.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	No(1)	Yes(3)	SEAD PID/ Warehousing Area	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Not evaluated(2)	Yes(3)	SEAD PID/ Warehousing Area	Restrict use of groundwater	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

Notes:
1) Results from the 2004 TCRA confirmatory sampling indicate the average concentrations of target analytes at this AOC are below recommended levels and a potential threat to human health and the environment posed by formerly impacted soils has been eliminated (USACE 2007a).
2) Potential human health risk in groundwater was not fully evaluated.
3) SEAD-67 is located within the PID/Warehouse Area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. Although no risk was identified within the soil and risk is unknown with respect to groundwater, this site is physically located within the boundary of the PID/Warehouse area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table O.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table O.3.2**).

Table O.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-67	Protective	The remedy implemented for PID/Warehousing Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table N.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-67	NA	Discuss reducing the frequency of periodic reviews with NYSDEC and EPA.	Not completed	Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-67	NA	Collect groundwater samples to determine if Class GA standards can be met in groundwater.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-67 was inspected on 3 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed.
- No apparent access to or use of groundwater was observed at SEAD-67.

Interviews

Since SEAD-67 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-67.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the PID/Warehouse Area have been completed and documented. No continuing active remediation is required in the PID/Warehouse Area. Based on a review of Closure Reports, LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at the SEAD-67 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the identified AOCs, and which has been expanded to encompass all land within the PID/Warehousing Area, Institutional, and Airfield Parcel of SEAD has been implemented and is currently being maintained, monitored and reported upon periodically.

- A second LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds at the three site, and which also has been expanded to include all land within the PID/Warehousing Area has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-67. SEAD-67 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD. No potential risk concerns were identified for any of the receptors evaluated (USACE 2007). However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. Groundwater was not evaluated as part of the SEAD-67 risk assessment; however, groundwater use restrictions are in place for the site as part of the sitewide PID/Warehouse Area. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-67 and the PID/Warehousing Areas. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-67, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for PID/Warehousing Areas is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





67-1



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-67
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 67	**Date of Inspection:**	02-03-2026
Location and Region:	PID Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 23F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present
No apparent groundwater use

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Erosion Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Adequate Signage?	☑ Yes	☐ No	☐ NA
If no, describe:			

II. Interviews

Appendix P

SEAD-43: Building 606 Old Missile Propellant Test Laboratory, SEAD-56: Building 606 Herbicide And Pesticide Storage, And SEAD-69: Building 606 Disposal Area

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APPENDIX P: SEAD-43: BUILDING 606 OLD MISSILE PROPELLANT TEST LABORATORY, SEAD-56: BUILDING 606 HERBICIDE AND PESTICIDE STORAGE, AND SEAD-69: BUILDING 606 DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEADs 43, 56, and 69 are located in the southeastern corner of the Depot on property that currently is associated with the New York State Department of Correctional Services' Five Points Correctional Facility. These areas are discussed as one AOC because SEAD-43 and SEAD-56 both represent historical uses of Building 606; SEAD-69 is a disposal area situated close to Building 606, which was previously suspected of receiving waste from the two other SWMUs.

In the 1960s, Building 606 was used as a missile propellant test laboratory; this use is designated as SEAD-43, the Old Missile Propellant Test Laboratory, which was used for quality assurance surveillance testing of military ordnance items. After 1976, Building 606 was used as a pesticide and herbicide storage and mixing facility; this historical use is designated as SEAD-56, Herbicide/Pesticide Storage. In 1989, the pesticide/herbicide storage area was upgraded when a new rinsate building was constructed to the east of Building 606, and the historical underground rinsate storage tank was replaced with a new vaulted tank that complied with the then-prevailing environmental regulations. SEAD-69 is a disposal area in an open field that is located southeast of Building 606 (USACE 2007a).

Initial Response

Field investigations were conducted at SEADs 43, 56, and 69 in February of 1994 as part of the *ESI for Eight Moderately Low Priority AOCs* (USACE 1995b), and complete analytical results for the soil, sediment, surface water, and groundwater samples collected can be found in that document and summarized in the ROD. Test pits revealed the presence of buried bricks, concrete blocks, construction debris, and piping. No impacted soil or obvious contamination was observed in the three test pits investigated.

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEADs 43/56/69 to ensure land use remains protective of site users.

Contaminants of Concern

Operations performed in SEAD-43 included the operation or functional testing of explosive devices. Inhibited Red-Fuming Nitric Acid (IRFNA) was used in and stored at and near Building 606 prior to its disposal at SEAD-13. As SEAD-56, Herbicide/Pesticide Storage, storage of pesticides and herbicides occurred at a now-demolished building formerly located west of Building 606. A historical concrete underground tank was also used for the intermittent storage of wastewater generated during the rinsing of the portable truck-mounted tank that was used for

mobile spraying operations at SEAD. It is suspected that waste from the IRFNA storage and pesticide/herbicide mixing was disposed of at SEAD-69. SEAD-69 measures approximately 100 feet by 100 feet in size, and contained various types of construction debris, including bricks and concrete blocks, visible at the surface.

Human Health and Ecological Risk Assessment

A mini risk assessment was completed that evaluated risk to receptors under the Prison land use scenario (i.e., prison worker, prison inmate, construction worker, worker at on-site day care, and child at on-site day care center). The risk assessment concluded that at SEADs 43, 56, and 69 there are no human health cancer risks above the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6}, and the calculated non-cancer HI for all receptors are less than 1.0. The risk assessment evaluated risk to receptors under the prison land use scenario. It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. Table 7-6 of the ROD (USACE 2007a) summarizes the calculated cancer and non-cancer risks for all receptors and exposure routes considered in the risk assessment presented in *Decision Document – Mini Risk Assessment* (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* requires the establishment of ICs. The LUC performance objectives for SEAD 43/56/69 include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEADs 43/56/69 are located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), USACE formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008e) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the "Prison Area."

SEADs 43/56/69 are located within the "Prison Area" property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEADs-43/56/69 is presented in **Table P.2.1** based on the data and risk presented in the ROD and the LUC RD.

The "Prison Area" has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table P.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use(1)	NA	Yes(2)	"Prison Area"	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEADs-43/56/69 are located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the FYR (**Table P.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table P.3.2**).

Table P.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEADs 43/56/69	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table P.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEADs 43/56/69	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025 and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026 to determine whether required LUCs imposed by the approved ROD at SEADs 43/56/69 are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No violations of the institutional or LUCs were observed.

- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEADs 43/56/69 continues to be used as a state maximum security correctional facility.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEADs 43/56/69 in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site interview conducted on 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEADs 43/56/69 is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEADs 43/56/69, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-43/56/69. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. SEAD-43/56/69 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil and groundwater COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. The site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the

site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEADs 43/56/69. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-69, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

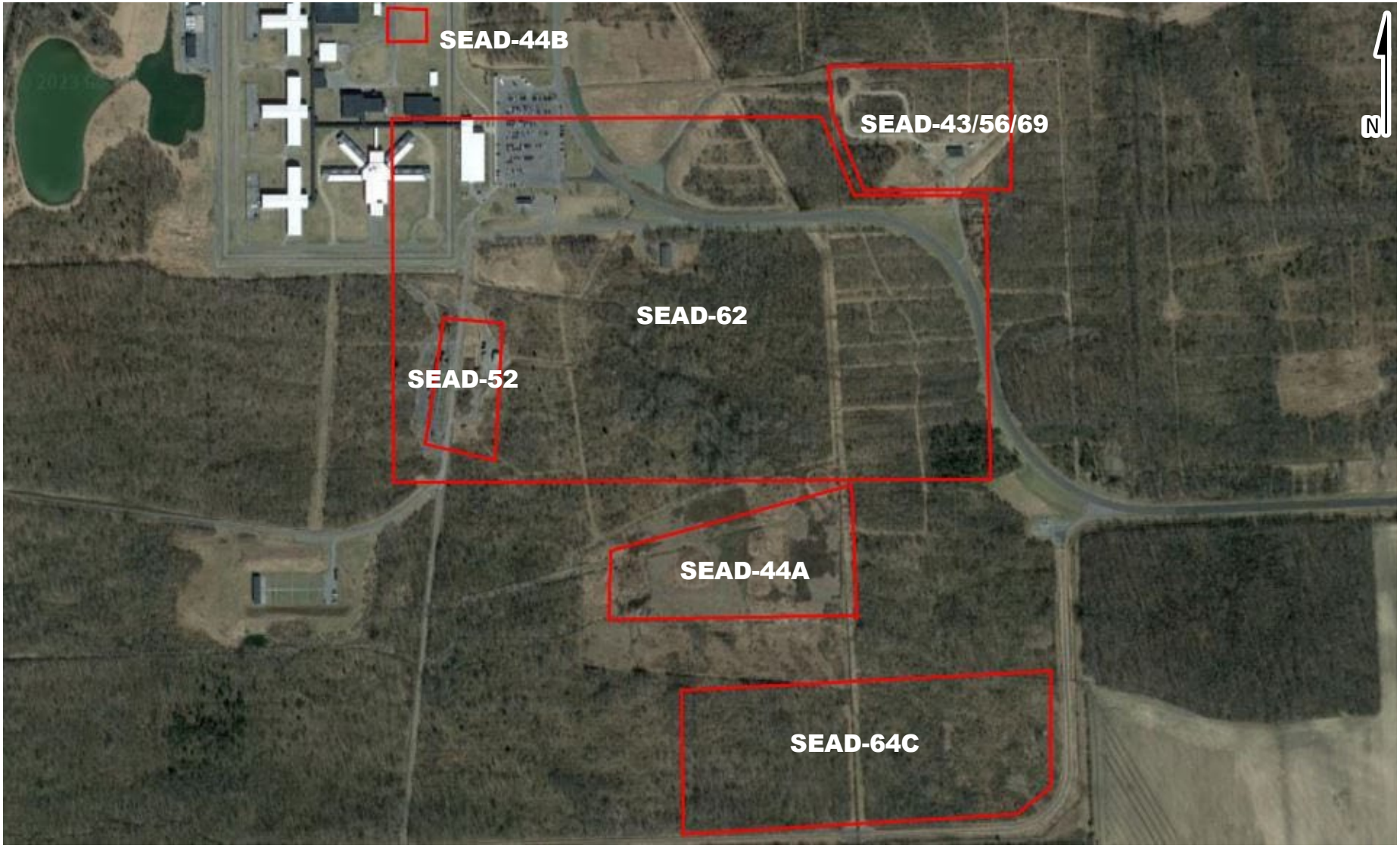
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

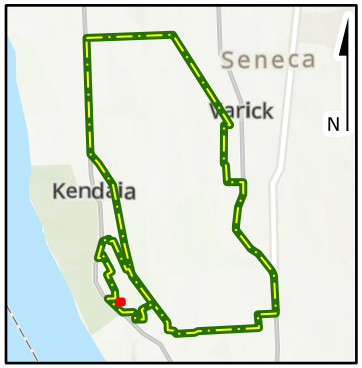
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix Q

SEAD-44A: Quality Assurance Test Laboratory

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APPENDIX Q: SEAD-44A QUALITY ASSURANCE TEST LABORATORY

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-44A (Quality Assurance Test Laboratory) is located in the southeastern portion of SEAD, approximately 1,000 feet east of Brady Road and 1,500 feet north of South Patrol Road on property that is currently associated with the New York State Department of Correctional Services' Five Points Correctional Facility. Building 416 was located at the AOC and a number of earthen berms that ran parallel to an unnamed dirt road at the AOC were present. The earthen berms were historically used for quality assurance testing of ordnance items, including various pyrotechnics, firing devices, and 40-millimeter (mm) practice and chemical smoke grenades. The above-ground testing of landmines also reportedly occurred in SEAD-44A in a separate bermed area.

Initial Response

Site investigations at SEAD-44A included an limited sampling plan (LSP) in 1993 and 1994, followed by a TCRA in 2000 and 2002. The LSP included soil, sediment, surface water, and groundwater sampling. Complete analytical results for the samples collected can be found in the *Expanded Site Investigation – Eight moderately Low Priority AOCs - SEADs 5,9,12 (A and B), (43, 56, 69), 44 (A and B), 50, 58, and 59* (USACE 1995b). During the TCRA, an unexploded ordnance (UXO) and OE clearance and removal and soil remediation was performed at SEAD-44A. Documentation of the work performed can be found in the document *UXO and Soil Remediation Area 44-A Final Report* (USACE 2003a).

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEAD-44A to ensure land use remains protective of site users.

Contaminants of Concern

During the period of its use, it is suspected that the area of SEAD-44A contained high levels of metals, cyanide, and other contaminants associated with ordnance testing. A drainage swale runs east to west along the middle of the AOC; this feature drains surface water runoff to the west towards Silver Creek. Complete analytical results for the samples collected during the LSP can be found in the *Expanded Site Investigation – Eight moderately Low Priority AOCs - SEADs 5,9,12 (A and B), (43, 56, 69), 44 (A and B), 50, 58, and 59* (USACE 1995b).

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-44A there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all Prison land use scenario receptors are less than 1. The risk assessment evaluated risk to receptors under the Prison land use scenario (i.e., prison worker, prison inmate, construction

worker, worker at on-site day care, and child at on-site day care center). It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. The results of total cancer risk and total non-cancer HI are summarized in Table 7-7 of the ROD (USACE 2007a) and in the Decision Document – Mini Risk Assessment (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* (USACE 2007a) requires the establishment of ICs. The LUC performance objectives for SEAD-44A include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEAD-44A is located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), USACE formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008e) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the "Prison Area."

SEAD 44A is located within the "Prison Area" property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEAD-44A is presented in **Table Q.2.1** based on the data and risk presented in the ROD and the LUC RD.

The "Prison Area" has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the

deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table Q.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use(1)	N/A	Yes(2)	"Prison Area"	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEAD-44A is located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table Q.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table Q.3.2**).

Table Q.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-44A	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table Q.3.2 Status of Recommendations from the 2017 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-44A	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026 to determine whether required LUCs imposed by the approved ROD at SEAD-44A are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR-site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No violations of the institutional or LUCs were observed.
- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEAD-44A continues to be used as a state maximum security correctional facility.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-44A in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site interview conducted 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-44A is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEAD-44A, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of public health and the environment. No early indicators of potential issues have been identified for SEAD-44A. SEAD-44A is currently monitored and reported annually. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil and groundwater COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. A residential, unrestricted site use was not evaluated in the risk assessment. However, the site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-44A. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

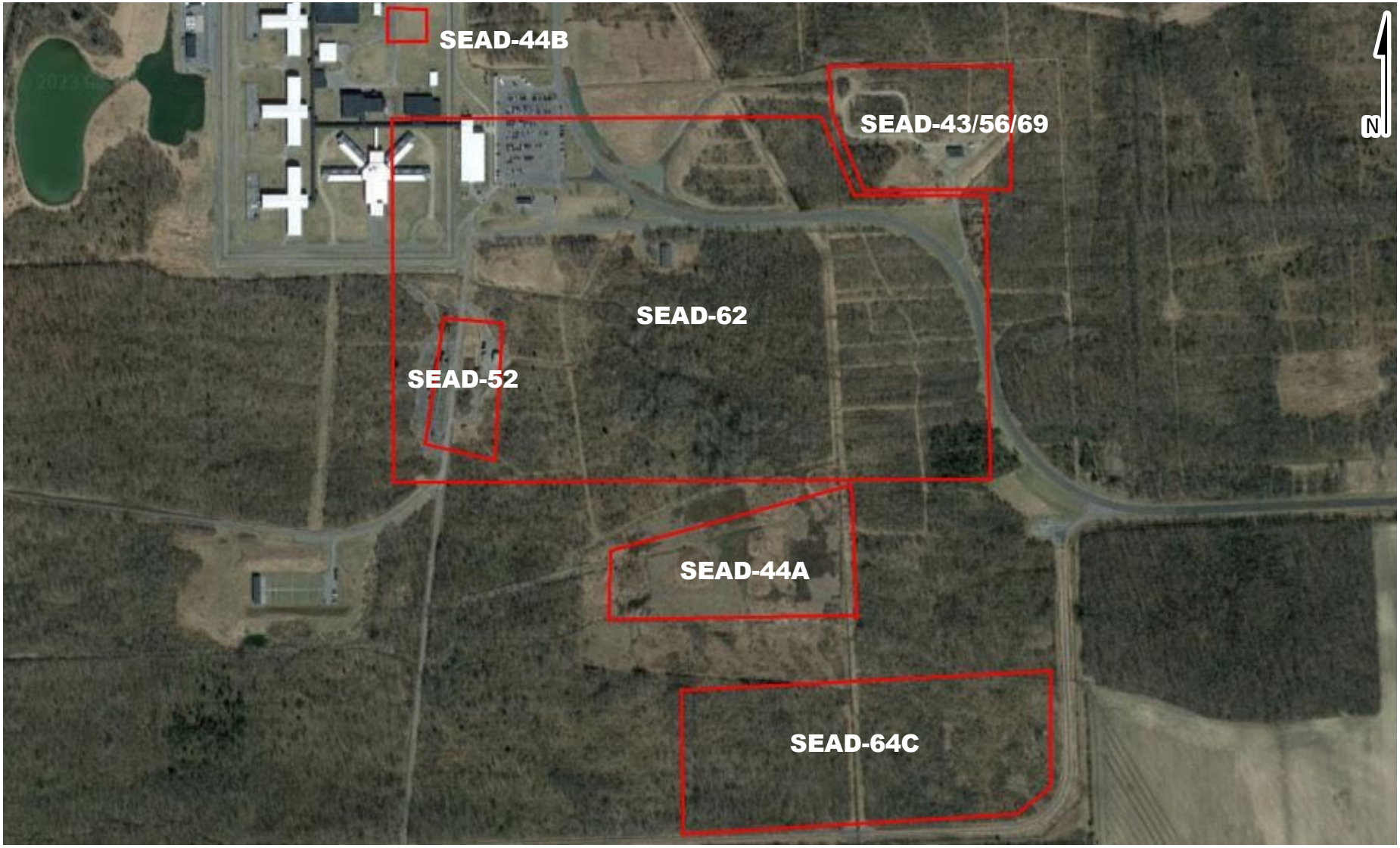
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

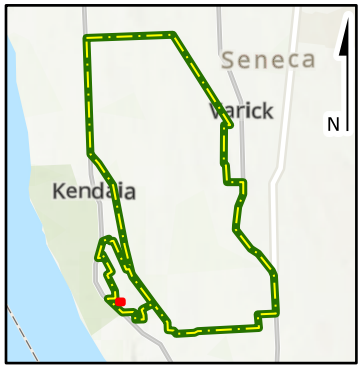
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix R

SEAD-44B: Quality Assurance Test Laboratory

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APPENDIX R: SEAD-44B QUALITY ASSURANCE TEST LABORATORY

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-44B (Quality Assurance Test Laboratory) runs along the west side of Brady Road and occupies an area that is approximately 350 feet by 200 feet on property that is currently associated with the New York State Department of Correctional Services' Five Points Correctional Facility. Two buildings were originally associated with SEAD- 44B. The buildings were part of a quality assurance test area for pyrotechnics, chemical smoke grenades, and other fire devices.

Initial Response

The investigative work at SEAD-44B included an ESI in 1993 and 1994. A summary of the surface soil, groundwater, surface water, and sediment data from the ESI are presented in Tables 6-17 to 6-20 of the ROD (USACE 2007a), respectively. Complete soil and groundwater analytical results for the samples collected can be found in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B Final* (USACE 2002a).

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEADs 43/56/69 to ensure land use remains protective of site users.

Contaminants of Concern

When SEAD-44B was designated as an AOC in the Federal Facilities Agreement, USACE indicated that the site might contain high levels of metals and possible UXO debris. Subsequent inspections of the AOC by USACE as part of the DoDs BRAC Ordnance and Explosives Archive Search Report indicate that ordnance was not found at SEAD-44B or in the vicinity of the two berms that were observed near the buildings (USACE 2007a). All of the samples were analyzed for TCL VOCs, SVOCs, pesticide/PCBs, TAL metals, and cyanide according to NYSDEC CLP SOW, and explosives by EPA Method 353.2.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-44B there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all prison land use scenario receptors are less than 1.0. The risk assessment evaluated risk to receptors under the Prison land use scenario (i.e., prison worker, prison inmate, construction worker, worker at on-site day care, and child at on-site day care center). It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. The results of total cancer risk and total non-cancer HI are summarized in Table 7-8 of the ROD

(USACE 2007a) and in the Decision Document – Mini Risk Assessment (USACE 2002a). An ecological risk assessment was conducted as part of the Mini-Risk Assessment (USACE 2002a), and no significant ecological risk was found at this site.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* requires the establishment of ICs. The LUC performance objectives for SEAD-44B include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEAD-44B is located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), USACE formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006f) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008e) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the "Prison Area."

SEAD 44B is located within the "Prison Area" property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEAD-44B is presented in **Table R.2.1** based on the data and risk presented in the ROD and the LUC RD.

The "Prison Area" has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of the SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table R.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use[(1)]	NA	Yes[(2)]	"Prison Area"	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEAD-44A is located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table R.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table R.3.2**).

Table R.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-44B	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table R.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-44B	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-44B	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values) to determine if UU/UE conditions can be met in soil at SEAD-44B.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-44B	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-44B.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026, to determine whether required LUCs imposed by the approved ROD at SEAD-44B are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No violations of the ICs or LUCs were observed.

- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEAD-44B continues to be used as a state maximum security correctional facility

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-44B in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site interview conducted 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-44B is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEAD-44B, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of public health and the environment. No early indicators of potential issues have been identified for SEAD-44B. SEAD-44B is currently monitored and reported annually. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil and groundwater COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. A residential, unrestricted site use was not evaluated in the risk assessment. However, the site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the site and

no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-44B. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

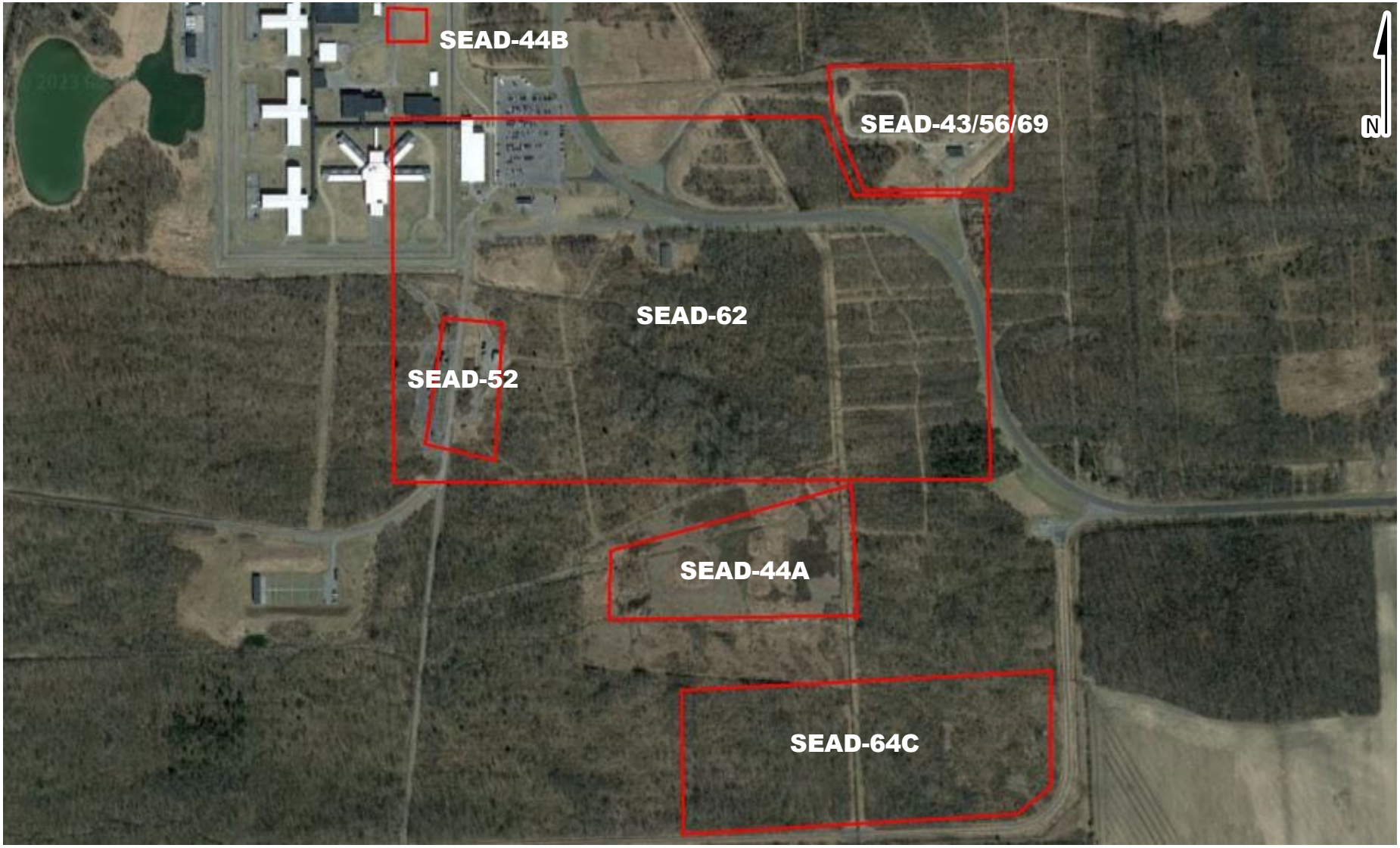
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

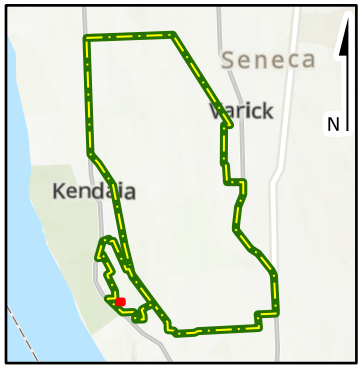
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix S

SEAD-52: Building 608 and 612 Ammunition Breakdown Area

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APPENDIX S: SEAD-52: BUILDING 608 AND 612 AMMUNITION BREAKDOWN AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-52 (Building 608 and 612 Ammunition Breakdown Area) is located in the southeastern portion of SEAD on land currently occupied by the Five Points Correctional Facility. SEAD-52 was active from the mid-1950s to the late-1990s. The area consists of four buildings: Buildings 608, 610, 611, and 612. Building 608 was previously used for the storage of ammunition magazines; Building 610 was used for ammunition powder collection; Building 611 was used for storage of equipment, paints, and solvents; and Building 612 was used for the breakdown and maintenance of ammunition. None of these buildings currently are active or used for storage of materials.

Initial Response

The field investigation at SEAD-52 included a Limited Sampling Plan that focused on soil sampling that was performed in 1993. Complete soil and groundwater analytical results from the LSP investigations are presented in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B, Final* (USACE 2002a).

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEAD-52 to ensure land use remains protective of site users.

Contaminants of Concern

The Limited Sampling Plan was performed in 1993 to evaluate the presence of explosives in the soil at SEAD-52 (USACE 2007a). The results of the investigation indicated that three explosive compounds were detected in one or more of the collected soil samples.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-52 there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all prison land use scenario receptors are less than 1. The risk assessment evaluated risk to receptors under the Prison land use scenario (i.e., prison worker, prison inmate, construction worker, worker at on-site day care, and child at on-site day care center). It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. The results of total cancer risk and total non-cancer HI are summarized in Table 7-9 of the ROD (USACE 2007a) and in the Decision Document – Mini Risk Assessment (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* requires the establishment of ICs. The LUC performance objectives for SEAD-52 include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEAD-52 is located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), USACE formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008e) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the "Prison Area."

SEAD-52 is located within the "Prison Area" property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEAD-52 is presented in **Table S.2.1** based on the data and risk presented in the ROD and the LUC RD.

The Prison Area has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a

risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table S.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use[(1)]	N/A	Yes[(2)]	"Prison Area"	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEAD-52 is located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table S.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table S.3.2**).

Table S.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-52	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table S.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-52	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-52	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values) to determine if UU/UE conditions can be met in soil at SEAD-52.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	NA
SEAD-52	NA	If UU/UE can be met in soil, collect groundwater samples to determine if Class GA standards can be met in groundwater at SEAD-52.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026 to determine whether required LUCs imposed by the approved ROD at SEAD-52 are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.
The following observations were made during the site inspection:

- No violations of the institutional or LUCs were observed.
- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEAD-52 continues to be used as a state maximum security correctional facility

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-52 in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site interview conducted 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at SEAD-52 is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEAD-52, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of public health and the environment. No early indicators of potential issues have been identified for SEAD-52. SEAD-52 is currently monitored and reported annually. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. A residential, unrestricted site use was not evaluated in the risk assessment. However, the site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-52. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

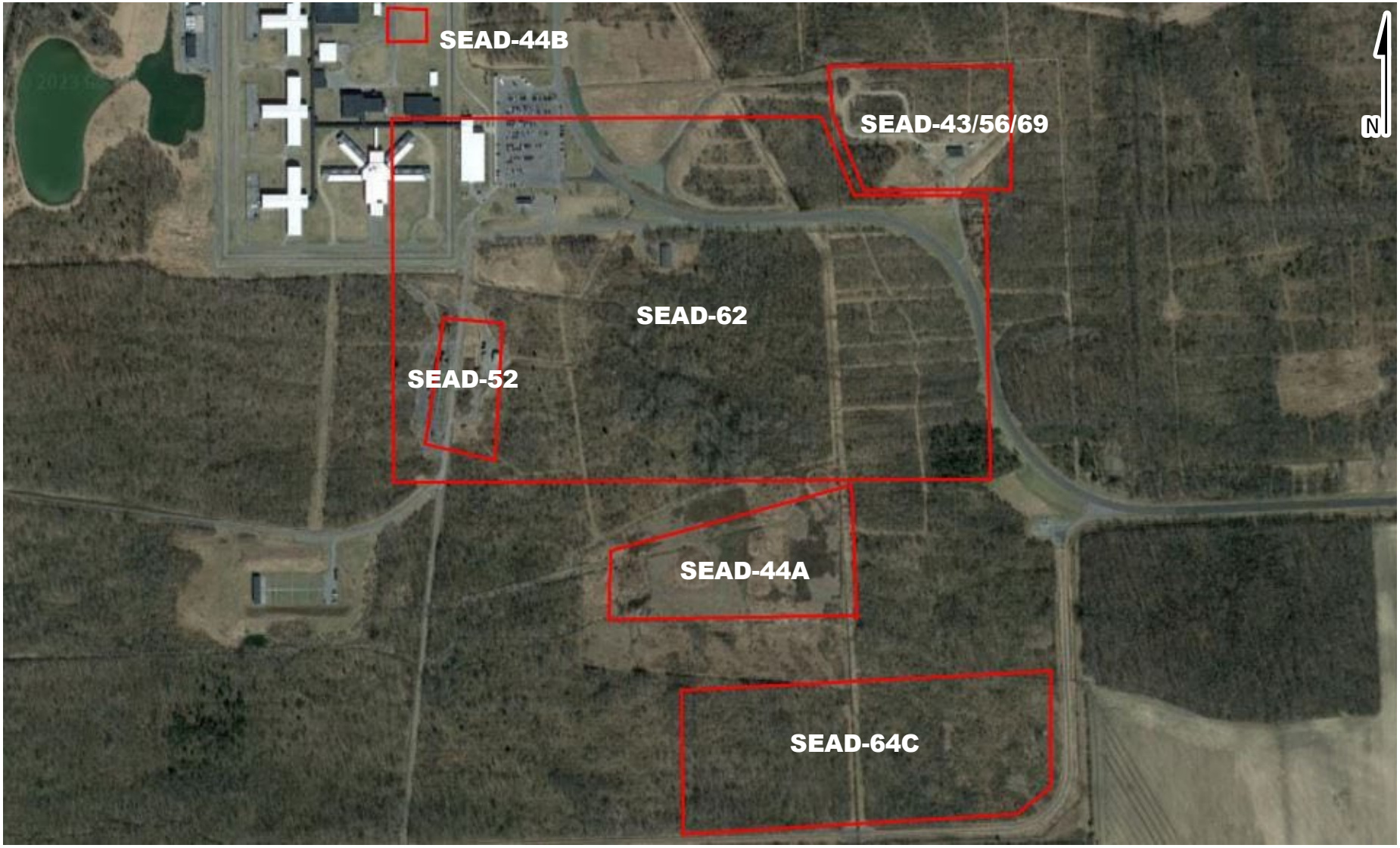
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

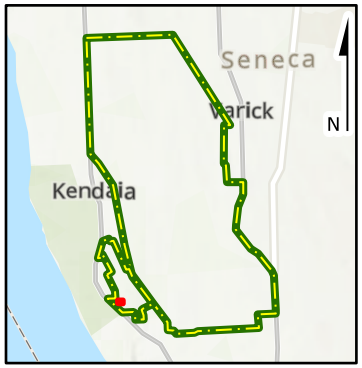
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix T

SEAD-62: Nicotine Sulfate Disposal Area Near Building 606 and 612

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APPENDIX T: SEAD-62 NICOTINE SULFATE DISPOSAL AREA NEAR BUILDING 606 AND 612

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Nicotine Sulfate Disposal Area (SEAD-62) is located in the southeastern portion of SEAD. It measures approximately 0.5-miles by 0.25-miles in size and is characterized by mostly undeveloped land with the exception of bunkers and buildings along the western perimeter.

Initial Response

The field investigation at SEAD-62 included an ESI that was performed in 1994. Three soil samples and three groundwater samples were collected from SEAD-62 and submitted for chemical analysis. All the samples were analyzed for the following: TCL VOCs, SVOCs, pesticides/PCBs, TAL metals, and cyanide according to the NYSDEC CLP SOW, and herbicides by EPA Method 8150. Complete soil and groundwater analytical results from the ESI are presented in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B, Final* (USACE 2002a).

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEAD-62 to ensure land use remains protective of site users.

Contaminants of Concern

Colloquial evidence suggests that two drums containing nicotine sulfate were disposed of in the area surrounding Buildings 606 and 612 (USACE 2002a). Summaries of the soil and groundwater results are presented in Table 6-22 and 6-23 of the ROD (USACE 2007a), respectively.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-62 there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all Prison land use scenario receptors are less than 1. The risk assessment evaluated risk to receptors under the Prison land use scenario (i.e., prison worker, prison inmate, construction worker, worker at on-site day care, and child at on-site day care center). It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. The results of total cancer risk and total non-cancer HI are summarized in Table 7-10 of the ROD (USACE 2007a) and in the Decision Document – Mini Risk Assessment (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* requires the establishment of ICs. The LUC performance objectives for SEAD-44A include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEAD-62 is located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), USACE formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008a) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the "Prison Area".

SEAD-62 is located within the Prison Area property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEAD-62 is presented in **Table T.2.1** based on the data and risk presented in the ROD and the LUC RD.

The Prison Area has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a

risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table T.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use[(1)]	NA	Yes[(2)]	Prison Area	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEAD-44A is located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table T.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table T.3.2**).

Table T.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-62	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table T.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-62	NA	Continue the implementation of LUCs and discuss reducing the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026, to determine whether required LUCs imposed by the approved ROD at SEAD-62 are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No violations of the institutional or LUCs were observed.
- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEAD-62 continues to be used as a state maximum security correctional facility

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-62 in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site visit conducted 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-62 is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEAD-62, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of public health and the environment. No early indicators of potential issues have been identified for SEAD-62. SEAD-62 is currently monitored and reported annually. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil and groundwater COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. A residential, unrestricted site use was not evaluated in the risk assessment. However, the site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for the eight sites (SEADs 43/56/69, 44A, 44B, 52, 62, and 64C) comprising the area known as the Prison Area. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

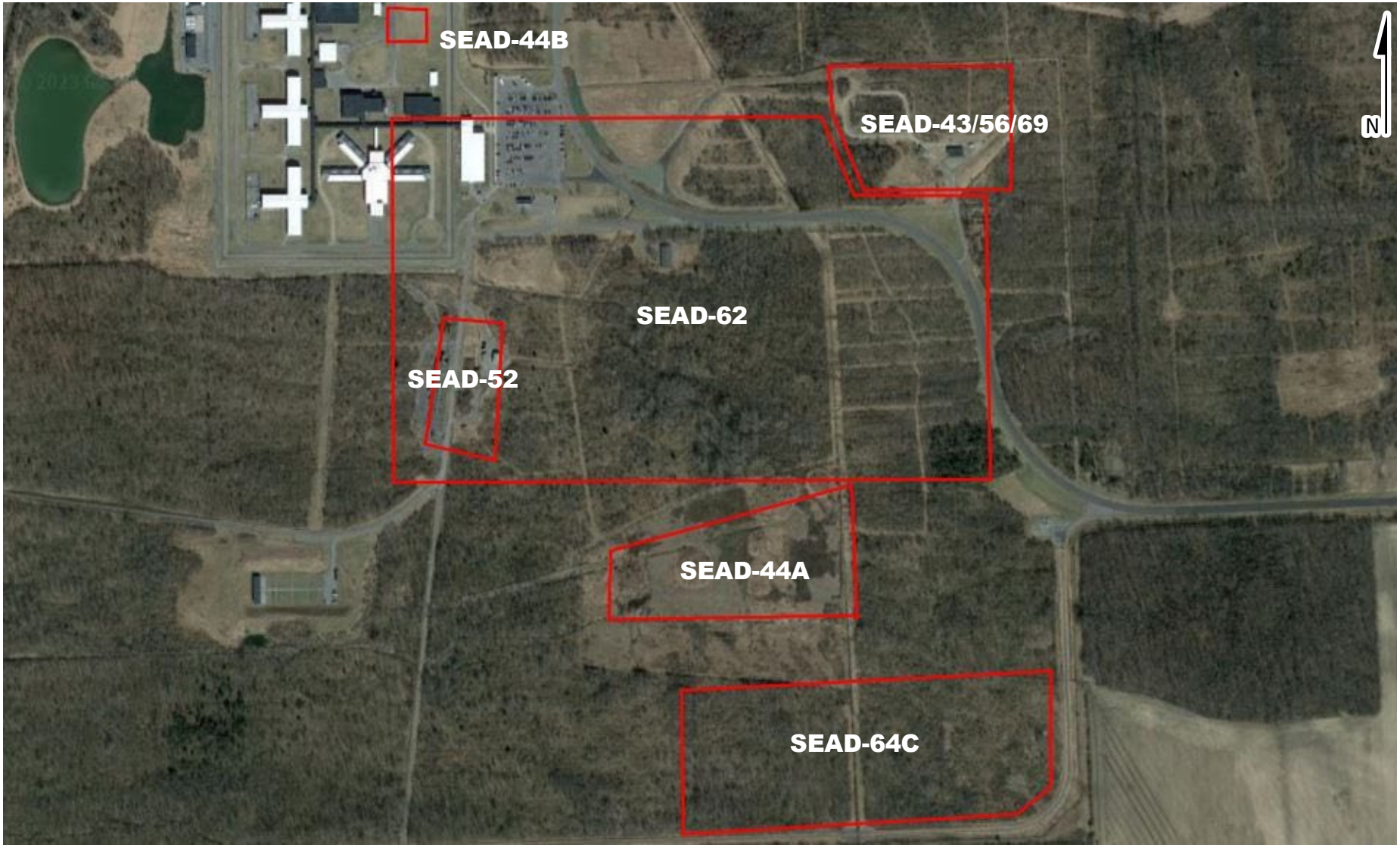
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

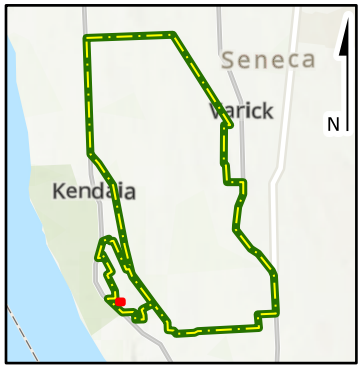
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix U

SEAD-64C: Garbage Disposal Area

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APPENDIX U: SEAD-64C GARBAGE DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The location of the rumored Garbage Disposal Area at SEAD-64C is near the intersection of East Patrol Road and South Patrol Road in the southeastern corner of SEAD. This former AOC is located within the bounds of the New York State Department of Correctional Service's Five Points Correctional Facility.

Initial Response

The field investigation at SEAD-64C included an ESI that was performed in 1994. Complete analytical results from the ESI are presented in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B*, Final (USACE 2002a). Surface soil samples, subsurface soil samples, and groundwater samples were collected at SEAD-64C and submitted for chemical analysis. All of the samples were analyzed for TCL VOCs, SVOCs, pesticides/PCBs, TAL metals, and cyanide according to the NYSDEC CLP SOW.

Basis for Taking Action

Because UU/UE was not evaluated there is a potential for risk to hypothetical future site users and an action was required at SEAD-64C to ensure land use remains protective of site users.

Contaminants of Concern

SEAD-64C is the location of a proposed SEAD landfill. An Army Pollution Abatement report concluded that the proposed site could be used for a sanitary landfill; however, no available information indicates that a formal landfill was established onsite. Information presented in the SMWU classification report suggests limited dumping may have occurred at the site and that transmission power lines may be buried throughout the site; however, USACE notified the NYSDEC that the area designated at SEAD-64C was misidentified as a historical landfill site and no waste was ever identified during USACE's investigations (USACE 2002a; 2007a) Summaries of the soil and groundwater results obtained during the ESI are presented in Table 6-28 and 6-29 of the ROD (USACE 2007a), respectively.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-64C there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors is less than 1. The risk assessment evaluated risk to receptors under the Prison land use scenario. It should be noted that the described property is being used and maintained for a correctional facility in perpetuity. A summary of the risk assessment results is presented in Table 7-12 of the ROD (USACE 2007a), and a full discussion is included in the Decision Document – Mini Risk Assessment (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for 17 No Action/No Further Action SWMUs Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B and l22E* requires the establishment of ICs. The LUC performance objectives for SEAD-64C include:

- Comply with the use limitations documented and imposed in the Deed used to transfer property containing SEADs 43/56/69, 44A, 44B, 52, 62 and 64C from the U.S. Government to the people of the State of New York for the construction of a correctional facility (See Seneca County Liber 612 Page 014 through 031).

USACE had previously documented and imposed LUCs within a portion of SEAD: in the southeastern corner of SEAD where the Five Points Correctional Facility ("Prison Area") currently is located. SEAD-64C is located within land covered by the existing LUCs imposed on land within the Prison Area parcel. Within the ROD (USACE 2007a), SEAD formalized and documented its intention to impose the existing LUCs on the AOCs located within the Prison Area parcel under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") (USACE 2006g) implemented LUCs for the SEAD PID/Warehouse Area. Addendum 2 (USACE 2008e) expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the Prison Area.

SEAD 64C is located within the Prison Area property that USACE transferred to the State of New York for use as a correction facility. This property was transferred prior to the issuance of the ROD signed on 3 July 2007 and there was no requirement for an Environmental Easement. A summary of the ICs currently implemented at SEAD-64C is presented in **Table U.2.1** based on the data and risk presented in the ROD and the LUC RD.

The Prison Area has an existing deed with a reversionary clause. The area consists of eight AOCs that were transferred in September 2000 under a public benefit conveyance that conveyed the land in the southeastern part of SEAD to the people of the State of New York for the construction of the Five Points Correctional Facility. The existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives and require the State of New York to use the property for the purpose of adult incarceration. Pursuant to the terms of the deed, the prison use restriction remains in effect for these AOCs in perpetuity, or the property legally reverts to the United States (USACE 2007a).

Hazardous substances may be present at one or more of the listed historical AOCs at concentrations that do not allow for UU/UE. However, based on the results of previous

investigations, risk assessments, and/or removal actions, these AOCs do not pose or represent a risk or threat to human health and the environment, given consideration of the area's continuing restricted use as a state maximum security correctional facility.

Table U.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use[1]	N/A	Yes[2]	"Prison Area"	Restrict site use	Deed and Reversionary Clause.

Notes:
1) No Risks identified for current and anticipated future land use.
2) SEAD-64C is located within the Prison Area where an area-wide IC is present. This IC restricts use of the property as a state maximum security correctional facility. This site is physically located within the boundary of the Prison area, and therefore, the IC is applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table U.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table U.3.2**).

Table U.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-64C	Protective	The remedy implemented for Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table U.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-64C	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

An interview of the correctional facility/grounds manager was conducted on 16 January 2026 to determine whether required LUCs imposed by the approved ROD at SEAD-64C are being maintained. Photographs are not permitted inside the correction facility property so an updated aerial image is used in place of the FYR-site visit photographic log contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No violations of the institutional or LUCs were observed.
- There is continued restricted use of the property as a state maximum security correctional facility.

Interviews

Based on an interview with a representative from Five Points Correctional Facility during the FYR process, SEAD-64C continues to be used as a state maximum security correctional facility

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-64C in the Prison Area have been completed and documented. No continuing active remediation is required for the Prison Area. Based on a review of the LUC RD Addendum 2, transfer deed, and the FYR site interview conducted 16 January 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-64C is currently protective of human health and the environment because existing deed provisions require the State of New York to use the property containing SEAD-64C, as a correction facility for the purpose of adult incarceration. If the State chooses to stop that activity, the property reverts back to the United States. Should the property revert to the Federal Government, the LUC will terminate, and a remedy substitution will be agreed to.

The selected remedy is still protective of public health and the environment. No early indicators of potential issues have been identified for SEAD-64C. SEAD-64C is currently monitored and reported annually. The LUCs restrict residential use and prevent the development of schools/childcare facilities and playgrounds, therefore the remedy is considered protective for current and expected future use. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, soil and groundwater COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for a correctional facility use (USACE 2007). Potential risk concerns were not identified for any receptors evaluated. A residential, unrestricted site use was not evaluated in the risk assessment. However, the site has deed provisions that limit use to an adult correctional facility. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for the eight sites (SEADs 43/56/69, 44A, 44B, 52, 62, and 64C) comprising the area known as the Prison Area. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-64C, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

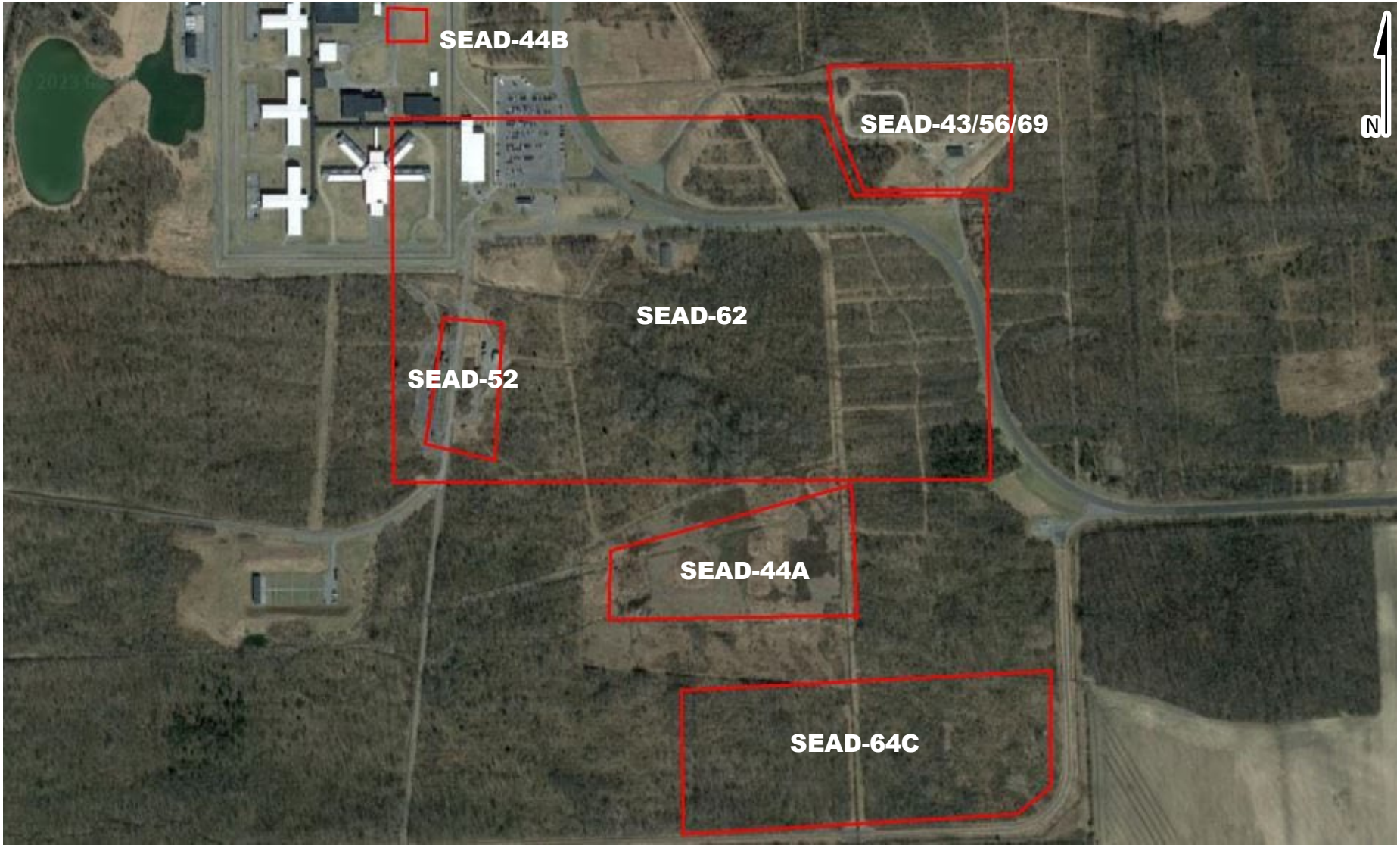
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

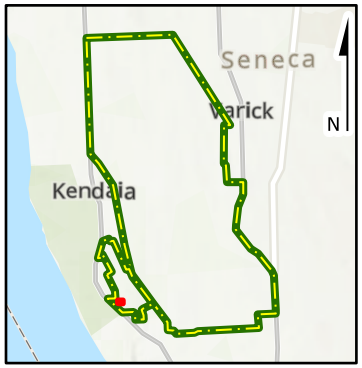
PROTECTIVENESS STATEMENT

The remedy implemented for the Prison Area is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

Former Depot Boundary

Prison Area Parcel
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 43, 44A, 44B, 52, 56, 62, 64C, 69	**Date of Inspection:**	02-03-2026
Location and Region:	Prison Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Continued use as correctional facility.

Observations:

Current Land Use

Correctional facility

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Type	Date	Location	Contact Information	Problems/Suggestions
O&M Site Manager	02-03-2026	At Site	Maintenance Supervisor Brad Parish	

Appendix V

SEAD-13: Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Site

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APPENDIX V: SEAD-13 INHIBITED RED FUMING NITRIC ACID (IRFNA) DISPOSAL SITE

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-13 is located in the northeast portion of SEAD and includes two historical disposal areas, SEAD-13-East and SEAD-13-West, which are located on the eastern and western sides of the Duck Pond's southern end, respectively. Historically, SEAD-13 was used during the early 1960s to dispose of quantities of unserviceable IRFNA, an oxidizer used in missile liquid propellant systems. SEAD-13 East contains disposal pits at the surface while the SEAD-13-West area exhibited no visible evidence of disposal pits. During the operation of the IRFNA Disposal Site, five pits were excavated out of the till overburden and were utilized as a neutralization area for IRFNA. The pits were approximately 30 feet long, 8 feet wide, and 4 feet deep and were filled approximately 2.5 feet deep with limestone chips. The sides of the pits were also lined with limestone. Barrels of unserviceable IRFNA were brought to the site from other locations within SEAD and were temporarily staged on pallets near the disposal pits. Each barrel of unserviceable IRFNA was emptied and mixed with water in an ejector. The mixture was then discharged to the disposal pit through a long polyethylene hose that discharged beneath the surface of the water in the pit being used. The disposed IRFNA/water solution mixed with the limestone in the pit to facilitate the neutralization of the acid. Ten barrels were typically discharged into each pit during 1 day of operation.

Initial Response

Site investigations performed at SEAD-13 included an ESI in 1993 and 1994, followed by an SI performed in 2001. The ESI work included geophysical investigations, surface and subsurface soil sampling, monitoring well installations, groundwater sampling, surface water/sediment sampling, and chemical analyses. The SI included additional soil borings (with surface and subsurface soil sampling), monitoring well installations, groundwater sampling, and chemical analysis.

Basis for Taking Action

Due to human health risk in groundwater an action was required at SEAD-13 to ensure land use remains protective of site users.

Contaminants of Concern

Complete analytical results from both investigations are presented in *Decision Document Mini Risk Assessment SEAD-13, Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Area, Final* (USACE 2004c).

The presence of nitrate is likely related to past activities conducted in the area. The extent of the nitrate plume is defined and restricted to the area located between the historical disposal pits observed in SEAD-13-East and the Duck Pond to the west. Groundwater data from monitoring

wells in the SEAD-13-West side of this AOC does not show evidence of a nitrate plume in this area of the AOC which is hydraulically downgradient of SEAD-13-East and the Duck Pond. Chemical analyses of surface water in the Duck Pond indicate that the nitrate/nitrite-nitrogen concentrations are below the levels established for drinking water sources nationally and within the State of New York.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-13 the human health cancer risks were below the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} if exposure to groundwater were to be limited. The calculated non-cancer HI for the construction worker is less than 1, but the greater than 1 for the Park worker (HI=7) and the recreational visitor (HI=3). The human health risk assessment was conducted using the 95% UCL of the mean as the EPC.

The elevated HI for both receptors was due to ingestion of groundwater, with nitrate/nitrite-nitrogen, aluminum, and manganese in groundwater was the largest contributors to risk for both receptors. When the groundwater pathway was eliminated, the total HIs for these receptors were less than 1. The cancer risk for the park worker, recreational visitor, and the construction worker were at acceptable limits.

Risks to a future resident were also calculated, which serves to evaluate receptors under the Resort/Residential land use scenario. The cancer risk for the resident (adult), 2×10^{-4} was greater than the EPA acceptable limit of 1×10^{-4}; and the cancer risk for resident (child), 1×10^{-4}, was at the acceptable limit. The cancer risk was due to ingestion of groundwater. If the groundwater pathway were eliminated, the cancer risk value for future residents would be within acceptable limits.

The maximum detected concentration was used as the EPC for the ecological risk assessment. An ecological risk assessment was completed and no COCs were identified (USACE 2004c).

REMEDIAL ACTIONS

Remedy Selection

No action was performed at SEAD-13. A groundwater use/access restriction was selected in the ROD (USACE 2007a) for SEAD-13 and is intended to eliminate human contact with groundwater, thereby reducing risk to within acceptable levels for potential human receptors. There is risk associated with the use of the groundwater at SEAD-13, driven by the concentrations of nitrate, aluminum, and manganese identified. The risk from the presence of metals is associated with the suspended solids contained in the collected groundwater samples and not from the groundwater itself.

The ROD titled *Seventeen SWMU Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)* signed on 3 July 2007 requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for unrestricted use and unlimited exposures; and

- Establishing, maintaining, monitoring, and reporting on an LUC that maintains the integrity of any current or future remedial or monitoring system.

Remedy Implementation

An LUC was implemented over the geographic area of SEAD-13 which prohibits access to or use of the groundwater. This restriction will remain in effect until the concentrations of hazardous substances in groundwater beneath the AOC have been reduced to levels that allow for UU/UE. Once groundwater cleanup standards are achieved, the groundwater use/access restriction may be eliminated, with EPA approval (USACE 2007a).

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") dated December 2006 implements LUCs for the SEAD PID/Warehouse Area. Addendum 2 expanded the LUC RD from the PID area to include sites that are in the area formerly known as the Conservation Area and the Airfield parcels. SEAD-13 is located on the property known as the Conservation Area Parcel and are still under the control of USACE. Addendum 2 applied the SEAD LUC RD enforcement, modification, and termination provisions to SEAD-13. The designated reuse of land within SEAD was revised in 2005 by SCIDA, and the new future land use for SEAD-13 is Residential/Resort. A summary of the ICs currently implemented at SEAD-13 is presented in **Table V.2.1** based on the data and risk presented in the ROD and the LUC RD.

Table V.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Groundwater	Yes	Yes	SEAD-13	Prevent access or use of the groundwater until New York State's GA groundwater standards are achieved	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table V.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table V.3.2**).

Table V.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-13	Protective	The remedy implemented for SEAD-13 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table V.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-13	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-13	NA	Collect new groundwater samples and perform a site-specific risk assessment to determine if Class GA standards can be met in groundwater at SEAD-13.	Not completed	Groundwater samples were not collected during the reporting period. Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-13 was inspected on 3 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No facilities were present or had been constructed at the site and no access to, or use of, groundwater was evident.

Interviews

Since SEAD-13 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-13.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the ROD for SEAD-13 have been completed and documented. No continuing active remediation is required for SEAD-13. Based on a review of the LUC RD Addendum 2 and the FYR site visit conducted on 3 February 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-13 currently is protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the identified AOCs has been implemented and currently is being maintained, monitored and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-13. SEAD-13 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, COCs and cleanup levels were not identified in the ROD (USACE 2007). Potential risk concerns were only identified for receptors' exposure to groundwater. LUCs that prohibit the use of groundwater have been placed on the site. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-13. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-13 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log

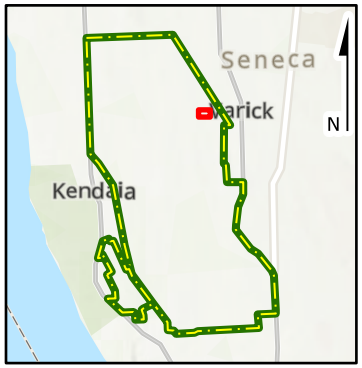




13-1



13-2



Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-13
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 13	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 24F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments
No apparent groundwater use

Observations:

Current Land Use
Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:
No signage

II. Interviews

Appendix W

SEAD-41: Building 718 Boiler Blowdown Leaching Pit

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APPENDIX W: SEAD-41 BUILDING 718 BOILER BLOWDOWN LEACHING PIT

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-41 is the blowdown leaching area suspected to have existed in the drainage ditch located approximately 40 feet west of Building 718, an abandoned boiler plant located in the northern end of SEAD, on property currently owned by SCIDA.

Initial Response

Work performed at SEAD-41 included an LSP conducted in 1993/1994, followed by a TCRA conducted in 2000. During the 1993/1994 sampling program, petroleum hydrocarbons were detected in all of the soil samples collected from SEAD-41. The surface samples collected nearest the point where the blowdown liquids were suspected of being discharged contained the greatest concentration of petroleum hydrocarbons. The sampling program delineated the extent of petroleum-impacted soil to an area approximately 40 feet long by 3 feet wide. The TCRA was conducted to remove the petroleum-contaminated soils identified during the LSP, and approximately 5 cy of petroleum contaminated soils were removed.

Basis for Taking Action

Due to potential human health risk in groundwater which was not fully evaluated, an action was required at SEAD-41 to ensure land use remains protective of site users.

Contaminants of Concern

Prior to connecting the boiler blowdown points to the sewer in 1979-1980, blowdown was reportedly released three times a day, and the discharged liquid was allowed to flow onto the ground at the blowdown point where it either infiltrated into the ground or flowed into the nearby drainage ditch. Each boiler is reported to have discharged between 400 and 800 gallons of blowdown liquids per day. The boiler blowdown is suspected to have contained water, tannins, caustic soda (sodium hydroxide), and sodium phosphate (USACE 2007a).

SVOCs were found in the soil samples collected at SEAD-41, with concentrations of benzo(a)pyrene, benzo(a)anthracene, benzo(b)fluoranthene, chrysene, and dibenzo(a,h)anthracene exceeding their NYSDEC TAGM #4046 cleanup objective level values. Table 6-8 in the ROD (USACE 2007a) summarizes the TCRA soil analytical results. The excavated soil was transported to another location within SEAD for use in a LTTD study at SEAD.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-41 the human health cancer risks are within or below the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 1. Maximum concentrations of analytes found at the

AOC were used as the EPCs for the area evaluated under the risk approach. The risk assessment evaluated risk to receptors under the Institutional future land use scenario (i.e., construction worker, adult resident, child resident, and lifetime resident).

An ecological risk assessment has not been performed for SEAD-41.

REMEDIAL ACTIONS

Remedy Selection

A ROD titled *Seventeen SWMU Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and 122E)* signed on 3 July 2007 required the establishment of ICs at the site (SEAD-41). The elements that composed the remedy included:

- Notification of future land owners of contaminated groundwater and requirement to meet all applicable laws and regulations should the owner decide to access and use the groundwater.

The selected remedy was based on the results of historical groundwater sampling data that was collected during the investigation of SEAD-41, which indicated that total petroleum hydrocarbons (TPH; 690 parts per billion [ppb]) were present in the upper aquifer of the groundwater. The LUC selected for SEAD-41 was already in place at the time the ROD was issued, and had been documented in the deed used to transfer the North End Barracks areas of SEAD. Part of the purpose of the ROD was to formalize and document USACE's intention to impose the existing LUC on the North End Barracks Area – SEAD-41 under CERCLA.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") dated December 2006 implemented LUCs for the SEAD PID/Warehousing Area. Addendum 2 expanded the LUC RD from the PID/Warehouse Area to include sites that are in the area formerly known as the North Barracks Area, and applied the SEAD LUC RD enforcement, modification, and termination provisions to SEAD-41.

SEAD-41 and the North Barracks Area was transferred to the SCIDA prior to the issuance of the ROD signed on 3 July 2007 and an Environmental Easement was not required. A deed was used to document the transfer of land to SCIDA, and the existing deed provisions ensure the property is used in a manner consistent with the above LUC Objectives.

In the deed, USACE notified SCIDA that groundwater contamination had been identified in the vicinity of the former Building 718. The reported level of TPH (690 ppb) exceeds the New York State Public Water System standards for unspecified organic contamination of 100 ppb. Under New York regulations, future owners or occupants of the area would need to confirm the quality and acceptability of the groundwater as a source of potable water before it could be used for such a purpose. A summary of the ICs currently implemented at SEAD-41 is presented in **Table W.2.1** based on the data and risk presented in the ROD and the LUC RD.

Table W.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Groundwater	Yes	Yes	North End Barracks Parcel	The Grantee, its successors and assigns, agree	Deed notice.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table W.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table W.3.2**).

Table W.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-41	Protective	The remedy implemented for SEAD-41 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Table W.3.2 Status of Recommendations from the 2017 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-41	NA	Discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Completed	Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-41	NA	Collect groundwater samples to allow a site-specific risk assessment to determine if Class GA standards can be met in groundwater.	Not completed	Groundwater samples were not collected during the reporting period. Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-41 was inspected on 3 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No use of groundwater was evident.

Interviews

Since SEAD-41 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-41.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-41 have been completed and documented. No continuing active remediation is required for SEAD-41. Based on a review of the LUC RD Addendum 2, transfer deed and the FYR site visit conducted on 3 February 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at the SEAD-41 currently is protective of human health and the environment because:

- An LUC that notifies future land owners of contaminated groundwater and requirement to meet all applicable laws and regulations should the owner decide to access and use the groundwater.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-41. SEAD-41 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, COCs and cleanup levels were not identified in the ROD (USACE 2007). Groundwater was not evaluated in the risk assessment. As a result, LUCs that prohibit the use of groundwater have been placed on the site. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-41. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for the SEAD-41 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

177

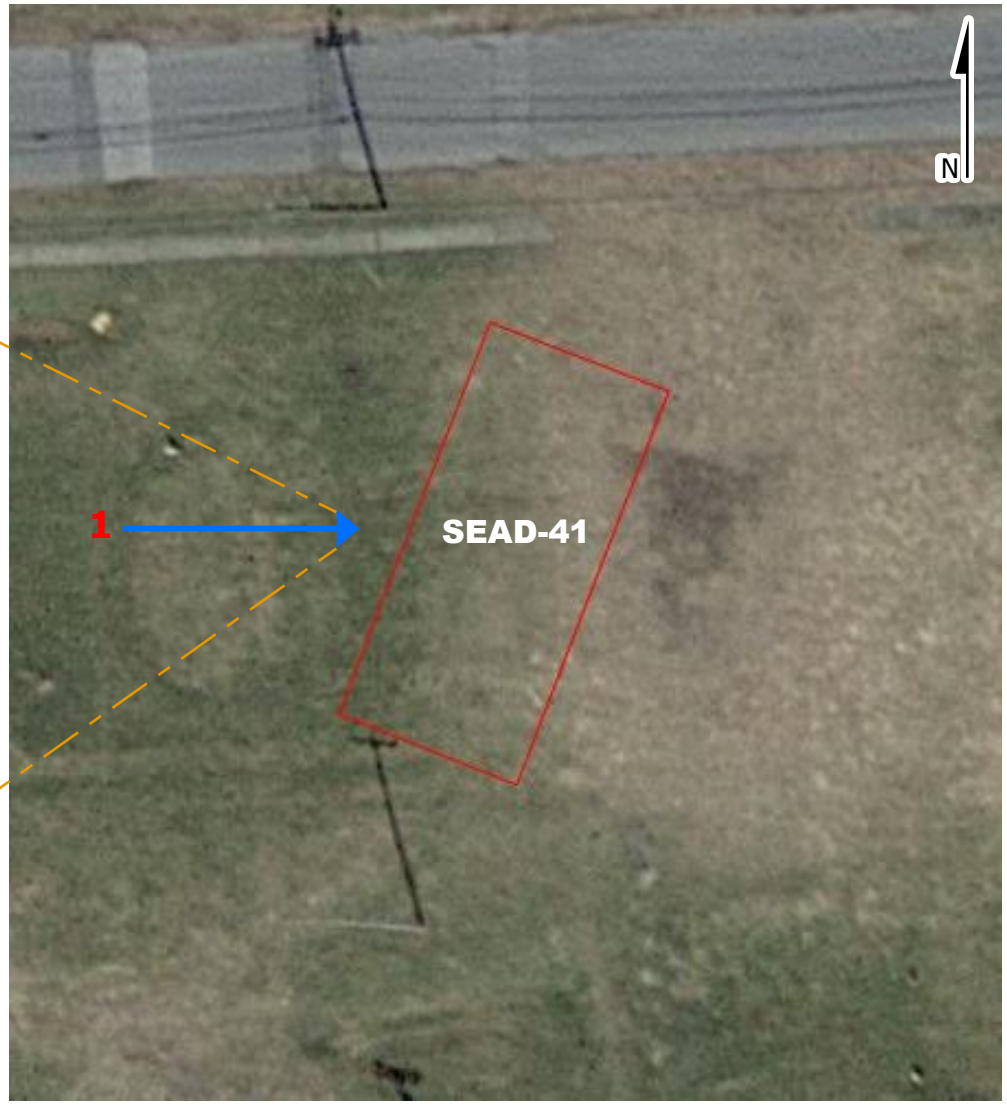
178 *This page intentionally left blank*

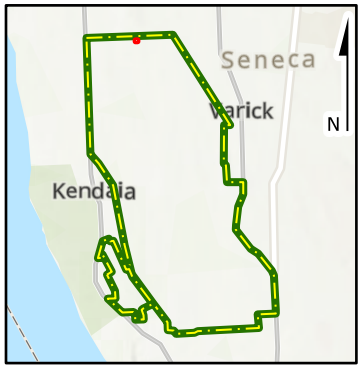
Attachment 1

Photographic Log



41-1





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-41
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 41	**Date of Inspection:**	02-03-2026
Location and Region:	Institutional Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 24F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No apparent groundwater use.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix X

SEAD-64B: Garbage Disposal Area

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APPENDIX X: SEAD-64B GARBAGE DISPOSAL AREA

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Garbage Disposal Area at SEAD-64B is located immediately north of Ovid Road near Building 2086 in the southern end of SEAD. SEAD-64B was used for garbage disposal from 1974 to 1979, which corresponds to a period when SEADs solid waste incinerator was not in operation. It appears that one or two truckloads of household waste were disposed at SEAD-64B based on the size of the fill area and amount of debris observed.

Initial Response

SEAD-64B is a historical landfill that is subject to regulation under the State of New York's Solid Waste Management Regulations (see 6 NYCRR Part 360). As a historical solid waste landfill, the site was subject to final closure in accordance with requirements of 6 NYCRR Part 360 in effect as of 28 August 1977. Once solid waste disposal ceased at SEAD-64B in the late 1970s, USACE applied a permanent soil cover over the disposed waste and allowed the area to revegetate naturally. The field investigation at SEAD-64B included an ESI performed in 1994. The former landfill continues to be covered and has an established vegetative covering. USACE requested formal closure of this historical landfill from the NYSDEC in letters dated 24 May 2005 and 14 August 2006. In a letter dated 11 September 2006, the NYSDEC agreed that SEAD-64B and SEAD-64D are closed under the New York Solid Waste Regulations.

No action subsequent to the installation of the landfill cap has been performed at SEAD-64B.

Basis for Taking Action

Due to potential human health risk in groundwater which was not fully evaluated an action was required at SEAD- 64B to ensure land use remains protective of site users. The classification for SEAD-64B suggests that the area will be used in a manner consistent with light industrial areas.

Contaminants of Concern

Complete analytical results from the ESI investigation are presented in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B, Final* (USACE 2002a).

No COCs were identified for SEAD-64B.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-64B there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 1. The cancer and non-cancer risks for all future potential receptors under the Conservation/Recreation land use scenario and exposure routes for

SEAD-64B were evaluated during the risk assessment. A summary of the risk assessment results is presented in Table 7-11 of the ROD (USACE 2007a), and a full discussion is included in the Decision Document – Mini Risk Assessment (USACE 2002a).

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

A ROD titled *Seventeen SWMU Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and122E)* signed on 3 July 2007 requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits unauthorized excavation within the bounds of the SWMU.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") dated December 2006 implements LUCs for the SEAD PID/Warehouse Area. Addendum 2 expanded the LUC RD from the PID area to include sites that are in the area formerly known as the Conservation Area and the Airfield parcels. SEAD-64B is located on the property formerly known as the Conservation Area Parcel.

An Environmental Easement for SEAD-64B was recorded prior to the transfer of SEAD-64B from the federal government and was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-64B is presented in **Table X.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-64B as transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The Conservation Area parcel property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the Conservation Area parcel incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table X.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Solid Waste Management Unit (SWMU)	Yes	Yes	SEAD-64B	Prohibit unauthorized excavation at SEAD-64B	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant
	Yes	Yes	SEAD-64B	Maintain soil and vegetative coverer above closed landfill	New York State's Solid Waste Regulations (6 NYCRR Part 360)

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table X.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table X.3.2**).

Table X.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-64B	Protective	The remedy implemented for SEAD-64B is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Table X.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-64B	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No unauthorized excavation or disturbance of the soil cap was observed.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-64B was inspected on 2 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No apparent excavations or digging were observed at SEAD-64B.
- The selected remedy is still protective of human health and the environment.

Interviews

Since SEAD-64B is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-64B.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-64B have been completed and documented. No continuing active remediation is required for SEAD-64B. Based on a review of the LUC RD Addendum 2, Environmental Easements, transfer deeds, and the FYR site visit conducted 2 February 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at SEAD-64B currently is protective of human health and the environment because:

- An LUC that prevents unauthorized excavation and preserves the maintenance of the existing soil cover.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-64B. SEAD-64B is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, COCs and cleanup levels were not identified in the ROD (USACE 2007a). Because waste is still present at the site, LUCs that prohibit excavation and maintenance of a soil cap were instituted. These LUCs eliminate exposure pathways to waste material. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-64B. On-going remedial monitoring activities include periodic evaluations of the effectiveness of the remedy. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-64B, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-64B is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log

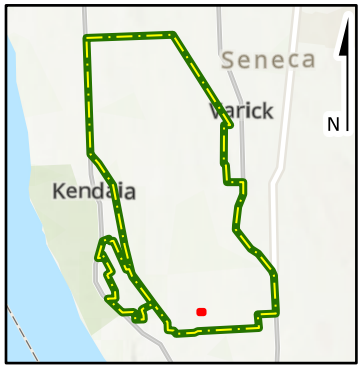


64B-2



64B-1





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-64B
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 64B	**Date of Inspection:**	02-02-2026
Location and Region:	Farming Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No evidence of unauthorized excavation
Soil cap and/or vegetative cover maintained.

Observations:

Current Land Use

Vacant Land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix Y

SEAD-64D Garbage Disposal Area West of Building 2203

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APPENDIX Y: SEAD-64D Garbage Disposal Area West of Building 2203

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-64D covers an area located between West Patrol Road and the railroad tracks located to the west along North-South Baseline Road in the southwestern portion of SEAD. Portions of SEAD-64D were used for garbage disposal from 1974 to 1979 when the SEAD solid waste incinerator was not in operation. The type of waste disposed at SEAD-64D was primarily household waste, although according to information contained in the SWMU Classification Report (USACE 1994a) and conditions observed during test pitting, construction debris was also disposed of at SEAD-64D.

Initial Response

SEAD-64D is a historical solid waste management unit (historical landfill) that is subject to regulation under the State of New York's Solid Waste Management Regulations (see 6 NYCRR Part 360). USACE ceased use of this unit in the late-1970s. As a historical solid waste landfill, the site was subject to final closure in accordance with requirements of 6 NYCRR Part 360 in effect as of 28 August 1977.

Once solid waste disposal ceased at SEAD-64D in the late 1970s, USACE applied a permanent soil cover over the disposed waste and allowed the area to revegetate naturally. The former landfill continues to be covered and has an established vegetative covering. The Army requested formal closure of the historical landfill from the NYSDEC in letters dated 24 May 2005 and 14 August 2006. In a letter dated 11 September 2006, the NYSDEC agreed that SEAD-64B and SEAD-64D are closed under the New York Solid Waste Regulations.

Basis for Taking Action

Due to human health risk in groundwater an action was required at SEAD-64D to ensure land use remains protective of site users. The training area classification for SEAD-64D suggests that the area will be used in a manner consistent with light industrial areas.

Contaminants of Concern

The field investigation at SEAD-64D included an ESI that was performed in 1994. During the ESI, soil, and groundwater samples were collected at SEAD-64D and submitted for chemical analysis. All samples were analyzed for TCL VOCs, SVOCs, pesticides/PCBs, TAL metals, and cyanide according to the NYSDEC CLP SOW. Complete analytical results from the ESI are presented in *Decision Document – Mini Risk Assessment SEAD 9, 27, 28, 32, 33, 34, 43, 44A, 44B, 52, 56, 58, 62, 64A, 64B, 64C, 64D, 66, 68, 69, 70, and 120B, Final* (USACE 2002a). Summaries of the soil and groundwater results were presented in Table 6-30 and 6-31 of the ROD (USACE 2007a), respectively.

No COCs were identified for SEAD-64D.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-64D there are no human health cancer risks above the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6}, and the calculated non-cancer HI for the construction worker is less than 1. Table 7-13 in the ROD (USACE 2007a) summarizes the calculated cancer and non- cancer risks for all future potential receptors under the Conservation/Recreation land use scenario and exposure routes considered in the risk assessment conducted at SEAD-64D in 2001 and 2002. The HI is equal to or greater than 1 for the park worker (HI=3) and the recreational child visitor (HI=1). The elevated HI for both receptors was due solely to ingestion of groundwater, and the elevated concentrations of metals in the groundwater samples associated with observed elevated turbidity levels. If the groundwater pathway was eliminated, the non-cancer risk would be reduced to within acceptable levels.

An ecological risk assessment was completed and no COCs were identified.

REMEDIAL ACTIONS

Remedy Selection

A ROD titled *Seventeen SWMU Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and122E)* signed on 3 July 2007 requires the establishment of ICs. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits access to and use of groundwater at the AOCs until its quality allows for unrestricted use and unlimited exposures

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits unauthorized excavation

- Maintain the integrity of any current or future remedial or monitoring system and maintain the existing soil cover

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") dated December 2006 implements LUCs for the SEAD PID/Warehouse Area. Addendum 2 expanded the LUC RD from the PID area to include sites that are in the area formerly known as the Conservation Area and the Airfield parcels, and applies the SEAD LUC RD enforcement, modification, and termination provisions to SEAD-64D. SEAD 64D is located on the property formerly known as the Conservation Area Parcel.

An Environmental Easement for SEAD-64D was recorded prior to the transfer of SEAD-64D from the federal government and was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEAD-64D is presented in **Table Y.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-64D was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The Conservation Area parcel property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the Conservation Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table Y.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Solid Waste Management Unit (SWMU)	Yes	Yes	SEAD-64D	Prohibit unauthorized excavation at SEAD-64D	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant
	Yes	Yes	SEAD-64D	Maintain soil and vegetative coverer above closed landfill	New York State's Solid Waste Regulations (6 NYCRR Part 360)
Groundwater	Yes	Yes	SEAD-64D	Prevent access or use of the groundwater until New York States GA groundwater Standards are achieved.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table Y.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table Y.3.2**).

Table Y.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-64D	Protective	The remedy implemented for SEAD-64D is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Table Y.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-64D	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No unauthorized excavation and disturbance to the soil cap and access to, or use, of groundwater was observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-64D	NA	Re-visit the conclusions of the risk assessment to demonstrate that UU/UE can be met in soil at SEAD-64D.	Not completed	Discussion of the risk assessment for SEAD-64A in this report did not review whether UU/UE conditions were met.	NA
SEAD-64D	NA	Collect new groundwater samples and perform a site-specific risk assessment to determine if Class GA standards can be met in groundwater at SEAD-64D.	Not completed	Groundwater samples were not collected during this reporting period, Potential for optimization to be completed under separate cover.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-64D was inspected on 2 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No access to, or use of, groundwater was evident.
- No unauthorized excavations or evidence of digging were observed.
- The vegetative cover was in place.

Interviews

Since SEAD-64D is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-64D.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for SEAD-64D have been completed and documented. No continuing active remediation is required for SEAD-64D. Based on a review of the LUC RD Addendum 2 Environmental Easements, transfer deeds, and the FYR site visit conducted on 2 February 2026, the remedy is functioning as intended by the decision documents.

The remedy implemented at SEAD-64D currently is protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater within the identified AOCs has been implemented and currently is being maintained, monitored and reported upon periodically.
- A second LUC that prevents unauthorized excavation and preserves the maintenance of the existing soil cover.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-64D. SEAD-64D is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three

FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, COCs and cleanup levels were not identified in the ROD (USACE 2007a). Groundwater was not evaluated in the risk assessment. As a result, LUCs that prohibit the use of groundwater have been placed on the site. Because waste is still present at the site, LUCs that prohibit excavation and maintenance of a soil cap were instituted. These LUCs eliminate exposure pathways to waste material. There are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-64D. On-going remedial monitoring activities include periodic evaluations of the effectiveness of the remedy. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-64D, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

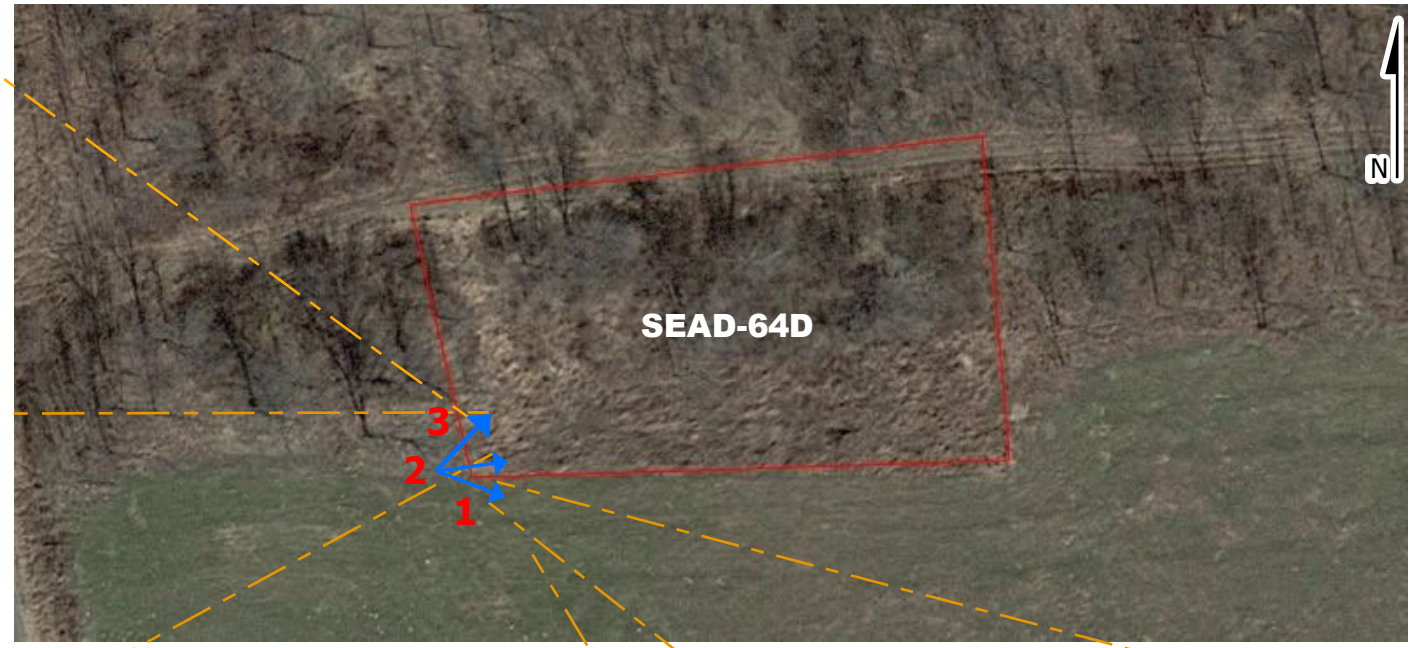
The remedy implemented for SEAD-64D is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log



64D-3

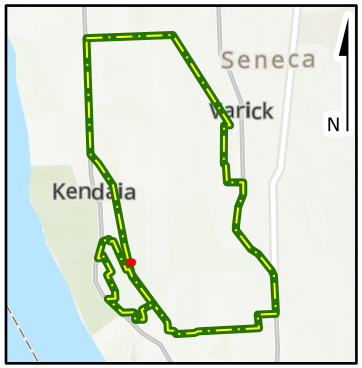




64D-2



64D-1



Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-64D
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 64D	**Date of Inspection:**	02-02-2026
Location and Region:	Farming Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny. 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No apparent groundwater use or access.
No evidence or unauthorized excavation.
Soil cap and/or vegetative cover maintained.
Monitoring well network is maintained.

Observations:

Current Land Use
Vacant Land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:
No signage

II. Interviews

Appendix Z

Ash Landfill Operable Unit (SEADs 3, 6, 8, 14, and 15)

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APPENDIX Z: ASH LANDFILL OPERABLE UNIT (SEADS 3, 6, 8, 14, AND 15)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Ash Landfill site is located along the western boundary of SEAD. The site is bounded on the north by Cemetery Road, on the east by a SEAD railroad line, on the south by open grassland and brush, and on the west by SEAD's boundary. The Ash Landfill site was initially estimated to encompass an area of approximately 130 acres. This larger area was investigated to ensure that no previously unknown waste disposal areas were overlooked. Following the RI, the area of the Ash Landfill site was refocused to an area of approximately 23 acres. This area is comprised of five AOCs including: Incinerator Cooling Water Pond (SEAD-3), the Ash Landfill (SEAD-6), the Non-Combustible Fill Landfill (NCFL) (SEAD-8), the Refuse Burning Pits (SEAD-14), and the Abandoned Solid Waste Incinerator Building (SEAD-15). The Debris Piles are located near SEAD-14. The Ash Landfill (SEAD-6) also includes a groundwater plume that emanates from the northern western side of the landfill area (USACE 2005c).

From 1941 to 1974, household trash and depot refuse was burned in a series of Refuse Burning Pits near the Abandoned Incinerator Building (Building 2207). During approximately this same period (1941 until the late-1950s or early 1960s) the ash from the Refuse Burning Pits was buried in the Ash Landfill. The Incinerator Building was built in 1974. Between 1974 and 1979, materials intended for disposal were transported to the incinerator. The source for the refuse was domestic waste from SEAD activities and family housing. Large items that could not be burned were disposed of at the NCFL. The NCFL is located southeast of the Incinerator Building. The NCFL was used as a disposal site for non-combustible materials, including construction debris, from 1969 until 1977. Ash and other residues from the incinerator were temporarily disposed of in the Incinerator Cooling Water Pond immediately north of the Incinerator Building. Approximately every 18 months, when the pond filled, the fly ash and residues were removed, transported, and buried in the adjacent Ash Landfill, east of the Cooling Pond. A fire destroyed the incinerator in May 1979, and the landfill was subsequently closed. A vegetative cover, comprised of native soils and grasses, was observed over the Ash Landfill during the 1994 RI (USACE 1994b).

Initial Response

Prior to the listing of SEAD on the NPL, two removal actions were performed at the Ash Landfill. The first action was the removal of a former 1000-gallon underground storage tank that was used to store heating oil and was located on the east side of the abandoned Incinerator Building. The second, a non-time critical removal action, was conducted by USACE in 1994/1995 and consisted of the excavation and thermal treatment of soil impacted with VOCs (USACE 1994b).

As part of a demonstration study, a 650-foot-long permeable reactive iron wall (zero valent iron) was installed near the western property line of the Ash Landfill AOC (USACE 2001b). A pilot study was performed from July 2005 to February 2006 to show that the use of mulch as the selected wall medium (i.e., biowalls) would effectively control migration of groundwater

contaminants at the site. The components and findings of the mulch biowall pilot study, which serve as the basis of design for the biowalls is presented in the Evaluation Report for the Mulch Biowalls at the Ash Landfill submitted as an appendix of the Draft RD Work Plan for the Ash Landfill Operable Unit (USACE 2006b, 2006c).

Since a wall material other than iron was selected, USACE conducted a review of the remedy's effectiveness one year after the walls are installed. Subsequent annual reviews were performed until the first FYR. The typical FYR schedule followed thereafter. Effectiveness of the biowalls are reported annually in an annual report.

Basis for Taking Action

Action was required at the Ash Landfill sites to comply with ARARs for NYS Class GA groundwater quality standards and federal MCLs, to reduce and improve non-carcinogenic and carcer risk levels for current and intended future receptors, and to prevent exposure to off-site receptors through possible off-site migration of the VOC plume.

Contaminants of Concern

The primary COCs at the Ash Landfill site are VOCs, including chlorinated and aromatic compounds, SVOCs (mainly PAHs), and, to a lesser degree, metals. The COCs are believed to have been released to the environment during former activities conducted at the Ash Landfill OU. The source of the VOCs was most likely the three alleged solvent dump areas northwest of the Ash Landfill site. The source of the VOCs that were allegedly disposed in this area is unknown.

The primary media investigated at the Ash Landfill site included soil (from soil borings and test pits), groundwater, and surface water and sediment (from Kendaia Creek and on-site wetlands and drainage swales). Based on these investigations, soil and groundwater were found to be the media that were the most significantly impacted by a release of chemicals onsite.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at Ash Landfill there are no human health cancer risks above the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors are less than 10 under the current and expected receptor scenarios.

The carcinogenic risks for potential future residents using groundwater for drinking at SEAD is 1.4×10^{-3}, and the HI is 3.2. Although risks exist for potential future residents using groundwater for drinking at SEAD, the LRA does not intend to use this land for residential purposes. The future intended use for the site has been determined by the LRA as a conservation/recreation area.

An ecological risk assessment performed based on the site soils, surface water, and sediment suggested a slightly elevated ecological risk due to the presence of heavy metals. However, the criteria for these media are not considered ARARs since none of the criteria are promulgated standards. NYSDEC and federal AWQSs, which are promulgated standards for Kendaia Creek,

are considered ARARs. No exceedances of the AWQSs were observed for downstream samples from Kendaia Creek, which is classified by NYSDEC as a Class C stream.

Metal exceedances were identified for ecological guidelines and reported literature values for on-site soil, sediment, and surface water. The actual ecological risk caused by these exceedances is not readily observable. Phase I and Phase II field evaluations for the RI included fish trapping and counting, benthic macroinvertebrate sampling and counting, and small mammal species sampling and counting. The results of the Phase I data collection did not indicate stressed biological or plant communities.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Record of Decision for the Ash Landfill Operable Unit* (USACE 2005a) requires the establishment of ICs. The elements that composed the remedy included:

- Excavation and off-site disposal of debris piles and establishment and maintenance of a vegetative soil cover for the Ash Landfill and the NCFL for source control.

- Installation of three in-situ permeable reactive barrier walls, and maintenance of the proposed walls and the existing wall for migration control of the groundwater plume.

- A Contingency Plan will be developed to include one of the following options: provision of an alternative water supply for potential downgradient receptors (farmhouse) or air sparging of the plume in the event that groundwater conditions downgradient of the recommended remedial action described above exceed trigger values.

- LUCs to attain the RAOs.

- Completion of a review of the selected remedy every 5 years (at minimum), in accordance with Section 121(c) of the CERCLA. If a wall material other than iron is selected, the Army will conduct a review of the remedy's effectiveness 1 year after the walls are installed. Subsequent annual reviews will be performed until the first FYR. The typical FYR schedule will be followed thereafter.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") dated December 2006 implements LUCs for the SEAD PID/Warehouse Area. Addendum 3 (USACE 2008b) expanded the LUC RD from the PID/Warehousing area to include sites that are in the area known as the Ash Landfill (SEADs-3, 6, 8, 14, and 15).

The RA was completed in October and November 2006 in accordance with the ROD for the Ash Landfill OU (USACE 2005a), the RD Work Plan (USACE 2006b), and the RD Report (USACE 2006c). The remedial action involved the following:

- Installation of three dual biowall systems, A1/A2, B1/B2, and C1/C2, to address VOCs in groundwater that exceed NYSDEC's Class GA groundwater standards

- Construction and establishment of a 12-inch vegetative cover over the Ash Landfill and the NCFL to prevent ecological receptors from coming into direct contact with the underlying soils that are contaminated with metals and PAHs

- Excavation and disposal of Debris Piles A, B, and C

- Re-grading of the Incinerator Cooling Water Pond to promote positive drainage

The LUC performance objectives for SEADs 3/6/8/14/15 are to:

- Prevent access to or use of the groundwater until cleanup levels are met

- Maintain the integrity of any current or future remedial or monitoring system such as monitoring wells and impermeable reactive barriers

- Prohibit excavation of the soil or construction of habitable structures (temporary or permanent) above the area of the existing groundwater plume

- Maintain the vegetative soil layer over the ash fill areas and the NCFL to limit ecological contact (USACE 2005b)

An Environmental Easement for the Ash Landfill was recorded in the Seneca County Clerk's office on 10 June 2011. A summary of the ICs currently implemented at SEADs 3/6/8/14/15 is presented in **Table Z.2.1** based on the data and risk presented in the ROD and the LUC RD.

The Ash Landfill along with the "PID Retained Parcels" was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The Ash Landfill was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the Ash Landfill parcel incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

As part of the RA at the Ash Landfill OU, post-closure operations include LTM. Groundwater monitoring is required as part of the RD, which was formulated to comply with the ROD. The groundwater LUCs are to continue until such time that the concentration of hazardous substances in the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use. Intrusive restrictions for those areas requiring a vegetative soil cover will continue

indefinitely. These LUCs will be implemented over the area of the groundwater plume, NCFL, and the Ash Landfill, as shown on Figure 1-1 of the ROD (USACE 2005b).

Table Z.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil	Yes	Yes	Ash Landfill Operable Unit	Restrict site use	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant
Groundwater	Yes	Yes	Ash Landfill Operable Unit	Restrict use of groundwater. Restrict excavation of soil or construction of inhabitable structures above groundwater plume.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant
Landfill	Yes	Yes	Ash Landfill Operable Unit	Maintain the vegetative soil layer over the ash fill are ("NCFL") to limit ecological contact.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant
Monitoring Wells	Yes	Yes	Ash Landfill Operable Unit	Maintain the integrity of any current or future remedial or monitoring system such as monitoring wells and impermeable reactive barriers.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant

System Operations/Operation and Maintenance

A mulch biowall has the potential to stimulate reductive dechlorination of chlorinated ethenes for many years. If necessary, mulch biowalls can be recharged with liquid substrates (e.g., emulsified vegetable oil) to extend the life of the biowall. A biowall recharge was recommended following the Year 18 review due to geochemical conditions in the biowalls trending in a direction where a recharge was necessary to maintain conditions suitable for reductive dechlorination. The biowalls were recharged with emulsified vegetable oil (EVO) to replenish the organic carbon content within the biowalls. The recharge event consisted of a one pore volume injection of dilute EVO solution into the existing biowall wells and via direct push technology injection points equally spaced between the existing biowall recirculation wells. Biowall recharge field activities were conducted from 26 March to 24 April 2025. In total, 131 direct-push technology points and 68 biowall recirculation wells were injected into for a total volume of 119,611 gallons of EVO solution (USACE 2025).

No additional enhancements were required during this FYR period.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table Z.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table Z.3.2**).

Table Z.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-3/6/8/14/15	Short-term Protective	The remedy implemented for Ash Landfill is considered short-term protective of the environment and of human health as optimization work is ongoing. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

204 **Table Z.3.2 Status of Recommendations from the 2021 FYR**

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
Ash Landfill OU (SEAD-3/6/8/14/15)	NA	Continue the annual frequency of monitoring	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	NA
Ash Landfill OU (SEAD-3/6/8/14/15)		Continue periodic biowall process monitoring and plume performance monitoring as a function of LTM.	On-going	Annual monitoring continued as intended.	NA
Ash Landfill OU (SEAD-3/6/8/14/15)		Each year a recharge evaluation will be completed. The recharge evaluation(s) conducted each review the chemical and geochemical data and determine if the biowall require a recharge.	On-going	A Biowall refresh evaluation was performed each year as part of the annual report. Recharge of the biowalls was performed in the spring of 2025.	2025
Ash Landfill OU (SEAD-3/6/8/14/15)		The vegetative covers at the Ash Landfill and the NCFL will be inspected annually to ensure that they remain intact and protective of ecological receptors	On-going	The fill cover has been inspected annually and reported on in the annual Land Use Control Inspection Reports.	NA

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206

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

There have been 35 rounds of groundwater monitoring conducted at the Ash Landfill which have been documented in 19 annual LTM reports.

The Annual Reports review the results of the LTM program as part of the ongoing evaluation of the remedy and provide conclusions and recommendations about the effectiveness of the remedial action, including the groundwater remedy and the vegetative landfill covers.

Based on the results of the LTM at the Ash Landfill since the installation of the full-scale biowalls, USACE has made the following conclusions:

- Trichloroethene (TCE) within the biowalls remains non-detect
- TCE, *cis*-dichloroethene (DCE), and vinyl chloride (VC) are present in groundwater at the site at concentrations above respective NYS Class GA groundwater standards
- Chemical results indicate that the concentrations of chlorinated ethenes are decreasing as they pass through the biowall systems
- Geochemical parameters indicate that the biowall recharge has aided the groundwater redox conditions to support anaerobic reductive dechlorination within the biowalls.
- The Performance Monitoring Objective of preventing off-site migration of COCs has not been met with concentrations of *cis*-DCE above standard at off-site well MW-56R.
- Vegetative covers are intact and preventing ecological receptors from contacting the underlying soil.
- While the remedial action meets the requirements of the EPA's operating properly and successfully designation, the presence of off-site COC migration and persistent concentrations of site COCs upgradient and downgradient of the biowalls suggest continued remedial optimizations are warranted at the site.

Site Inspection

The five SEADs (SEADs 3, 6, 8, 14, and 15) comprise the Ash Landfill OU were inspected on 2 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. LUC inspection photographic logs from 2025 are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**. Well inspections were

also performed during groundwater sampling events, and a figure that shows the site features, including the monitoring wells, is contained in **Attachment 3**.

The following observations were made based on the site inspections:

- No prohibited facilities were present or had been constructed at the site and no access to, or use of, groundwater was evident.
- The integrity of the current remedial and monitoring system, including permeable reactive barriers and monitoring wells, was found to be intact.
- Landfill covers/containment features were in place and operating as designed and no damage to the cover/containment was observed.
- Recent inspection of the vegetative covers at the Ash Landfill and the NCFL continue to indicate that the covers are in acceptable condition.
- No recent excavations were observed.

Interviews

Since the Ash Landfill is uninhabited and unoccupied, no interviews were conducted during the FYR process for the Ash Landfill.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed RODs for AOCs within the Ash Landfill OU have been completed and documented. Long-term remedy maintenance and monitoring activities are being conducted as required in the Ash Landfill OU. Based on a review of the RD Report (USACE 2006b), LTM Reports, LUCs RD, environmental easement, transfer deed, and the FYR site visit conducted on 2 February 2026, all remedies are functioning as intended by the decisions documents.

The remedy implemented at Ash Landfill AOCs (SEADs 3, 6, 8, 14, and 15) currently is protecting human health and the environment because:

- The remedy required by the ROD has been conducted and completed, and the results of the implemented remedial action has been reported to, and accepted by the EPA and the NYSDEC.

- The permeable reactive barrier walls installed to intercept and treat the contaminated groundwater plume identified within the OU have been shown to be operating properly and successfully. They are intended to promote the reduction of the primary plume contaminant's (TCE) concentrations in groundwater without allowing breakdown-product contaminants (VC, DCE, etc.) to spread beyond the bounds of the OU at levels that threaten groundwater supplies. However, contamination has been detected off property at concentrations exceeding applicable standards. Optimization work is ongoing to further respond to contamination at the Ash Landfill OU.

- The integrity of the existing monitoring wells and permeable reactive barrier walls is being monitored and maintained.

- Soil covers installed over the Ash Landfill and the NCFL have re-vegetated and have been observed to be in good repair.

- The former abandoned incinerator (Building 2207, SEAD-15) has been demolished and the associated demolition debris has been removed from the OU and disposed at an off-site landfill.

- New construction of temporary or permanent inhabitable buildings or structures has not occurred.

The selected remedy is still protective of human health and the environment and functioning as intended by the decision document.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy. LUCs are in place that prohibit construction of structures and prohibit the use of groundwater.

Cleanup levels were set forth for COCs in soil and groundwater. For soil, the cleanup levels NYS SCO values contained in TAGM 4046 (USACE 2006c). The soil cleanup levels were compared to the EPA residential and industrial soil RSLs and NYSDEC SCOs to evaluate changes to toxicity data. **Table Z.5.1** presents this comparison. While residential use is restricted for SEAD-25, residential RSLs and unrestricted SCOs are presented for comparison only. While residential use is restricted for the Ash Landfill OU, residential RSLs and unrestricted SCOs are presented for comparison only. All soil cleanup levels, except two PAHs, chromium (assumed as hexavalent chromium), and Aroclor 1260, are below the EPA industrial soil RSLs and NYSDEC restricted commercial use SCOs. However, the two PAHs, phenanthrene and benzo(g,h,i)perylene, are below the EPA industrial soil RSLs. The hexavalent chromium and Aroclor 1260 industrial soil RSLs are based upon a cancer risk of $1x10^{-6}$. The cleanup level for chromium is only about 1.5 times the RSL and the cleanup level for Aroclor 1260 is

approximately 4 times the RSL, which reveals that cancer risks are within the CERCLA cancer risk management range of 1 x 10^{-4} to 1 x 10^{-6} for the likely use of the Ash Landfill AOCs. LUCs are in place for the sites to prohibit the construction of habitable structures and maintain a soil or vegetative cap. These LUCs eliminate exposure pathways that would present a potential risk concern. Therefore, the soil cleanup levels are still valid and protective.

The Ash Landfill AOCs are undergoing active groundwater LTM. The screening levels and cleanup levels are reviewed and updated in the Annual LTM report (USACE 2026b). In the latest report, groundwater concentrations were compared against NYS AWQS Class GA (6 CRR-NY 703.5) or, if not available, EPA RSLs (TR=1E-06, THQ=0.1, November 2024) for Tap Water. **Table Z.5.2** presents the NYS AWQS. As shown in **Table Z.5.2**, the NYS WQS, except for cadmium, have not changed since the time of the remedy, and the cleanup levels in the ROD are protective. LUCs are present that prohibit the use of groundwater. As a result, the cleanup levels and RAOs from earlier RODs are considered still valid.

345 **Table Z.5.1 Comparison of Toxicity Data and Cleanup Levels in Soil**

Contaminants of Concern Listed in ROD	Cleanup Value in ROD (1)	Comparison of Screening Levels		Comparison of Potential Cleanup Levels	
		Current Federal Screening Level (Residential Use)(2)	Current Federal Screening Level (Industrial Use)(2)	Current NYSDEC Soil Cleanup Objectives (Unrestricted Use)(3)	Current NYSDEC Soil Cleanup Objectives (Restricted Use)(3)
1,2-Dichloroethene	0.3	6.3	37	0.19	500
Trichloroethene	0.7	0.41	1.9	0.47	54
Vinyl Chloride	0.2	0.059	1.7	0.03	7.1
2-Methylnaphthalene	36.4	24	300	--	--
Acenaphthylene	41	360	4,500	100	500
Dibenzofuran	6.2	7.8	120	2.1	180
Phenanthracene	50	1,800	23,000	1.1	47
Benzo(a)anthracene	0.22	1.1	21	1	37
Bis(2-ethylhexyl)phthalate	50	39	160	--	--
Benzo(b)fluoranthene	1.1	1.1	21	1	37
Benzo(k)fluoranthene	1.1	11	210	0.8	47
Benzo(a)pyrene	0.61	0.11	2.1	1	3.7
Indeno(1,2,3-cd)pyrene	3.2	1.1	21	0.5	37
Dibenz(a,h)anthracene	0.14	0.11	2.1	0.33	3.7
Benzo(g,h,i)perylene	50	180	2,300	0.64	47
Aroclor-1260	1	0.24	0.99	0.1	1
Cadmium	1.8	0.71	10	2.5	3.7
Chromium	26	0.95	20	1	11
Copper	25	310	4,700	50	280
Lead	500	200	800	63	1,000
Zinc	89.1	2,300	35,000	109	10,000

346 Notes:
347 1) Cleanup levels presented in the table originate from the site-specific ROD
348 2) Federal soil screening values are EPA RSLs for Residential and Industrial Soil based on a risk level – 1E-06 or target HQ = 0.1; November 2024.
349 3) State soil cleanup goals are from 6 CRR-NY 375-6.8 (b) Restricted Commercial use; Updated 31 December 2025.
350 "--" Indicates no criteria or not applicable Units are in milligrams per kilogram (mg/kg)

Table Z.5.2 Comparison of Toxicity Data and Cleanup Levels in Groundwater

Contaminants of Concern Listed in ROD	Cleanup Level in ROD[1]		Current NYSDEC Groundwater Cleanup Objectives (Class GA)[3]	Are the newly promulgated cleanup goals less than those used in the ROD? (Y/N)
Volatile Organic Compounds				
1,1,1-Trichloroethane	5		5	N
1,2-Dichloroethene	5		5	N
Trichloroethene	5		5	N
Vinyl Chloride	2		2	N
Metals				
Cadmium	10		5	Y
Chromium	50		50	N
Copper	200		200	N
Lead	25		25	N
Zinc	300		--	N

Notes:
1) Cleanup levels presented in the table originate from the site-specific ROD

2) NYSDEC AWQS for Class GA waters. From 6 NYCRR Parts 701-705.
"--" Indicates no criteria or not applicable
Units are in micrograms per liter (µg/L)

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEADs-3/6/8/14/15. Chemical results indicate that the concentrations of chlorinated ethenes are decreasing as the groundwater plume passes through the biowall locations and that groundwater redox conditions are conducive for reductive dechlorination to occur within the biowalls. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at the SEADs-3/6/8/14/15, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

Issues identified at the Ash Landfill OU are as follows:

- Remaining contamination in groundwater that warranted the implemented remedies and the current groundwater LTM.
- The identification of PFAS as a potential contaminant of concern, which led to its inclusion in the ongoing PFAS SI.

Based on this FYR and the 19 years of LTM monitoring at the Ash Landfill OU, USACE has the following recommendations:

- Continue the implementation of LUCs.

- Continue the annual frequency of monitoring, evaluations of the effectiveness of the biowalls, and the inspections of the landfill cover.

- Continue ongoing optimization activities to address residual source areas, which included the expansion of the site well network, installation of seven monitoring wells in the spring of 2025, and the sampling of these wells in July 2025 and a subset of the wells in June 2026. An amendment for additional injection trenches has also been proposed.

PROTECTIVENESS STATEMENT

The remedy implemented for Ash Landfill is considered short-term protective of the environment and of human health as optimization work is ongoing. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Attachment 1

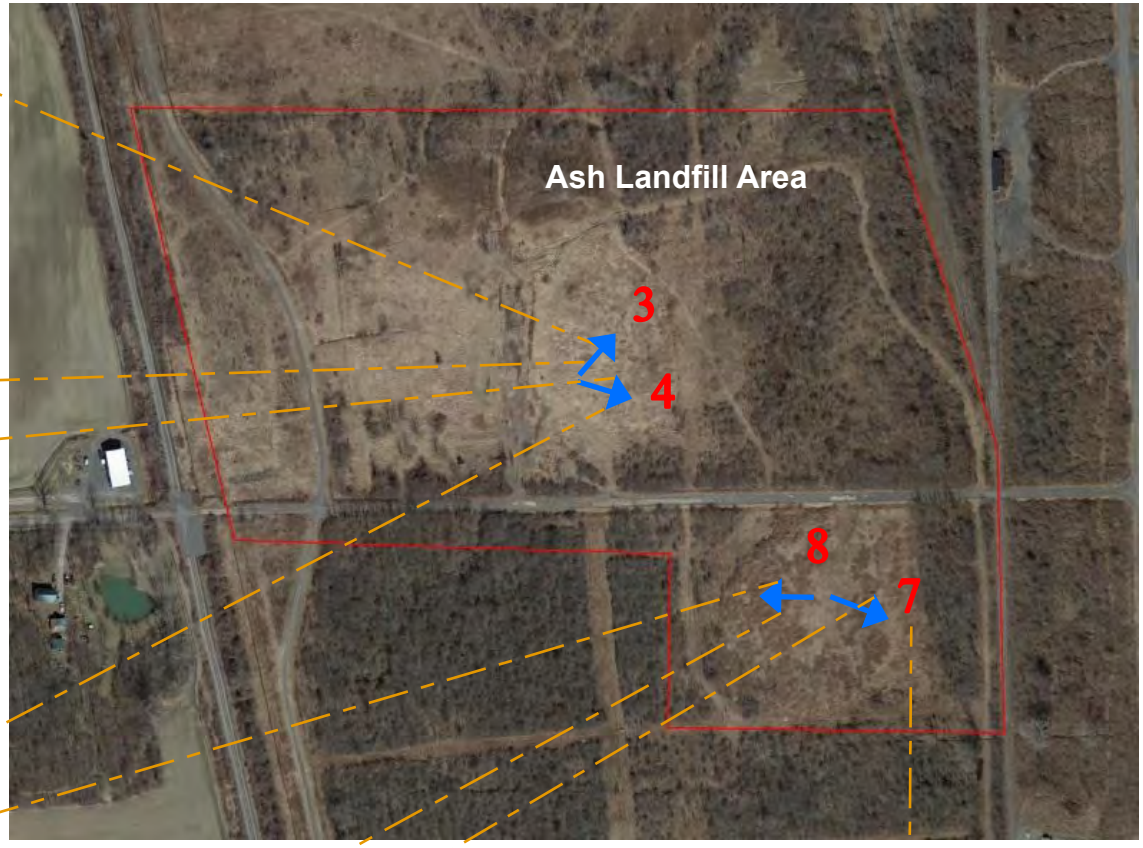
Photographic Log



AL-3



AL-4

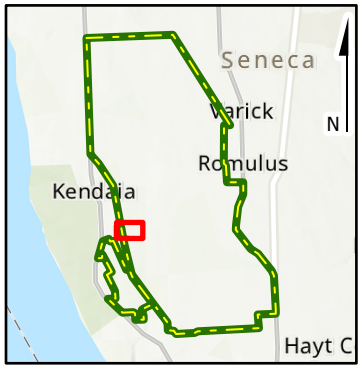




AL-8



AL-7



Legend

Former Depot Boundary

Photo Viewing Direction

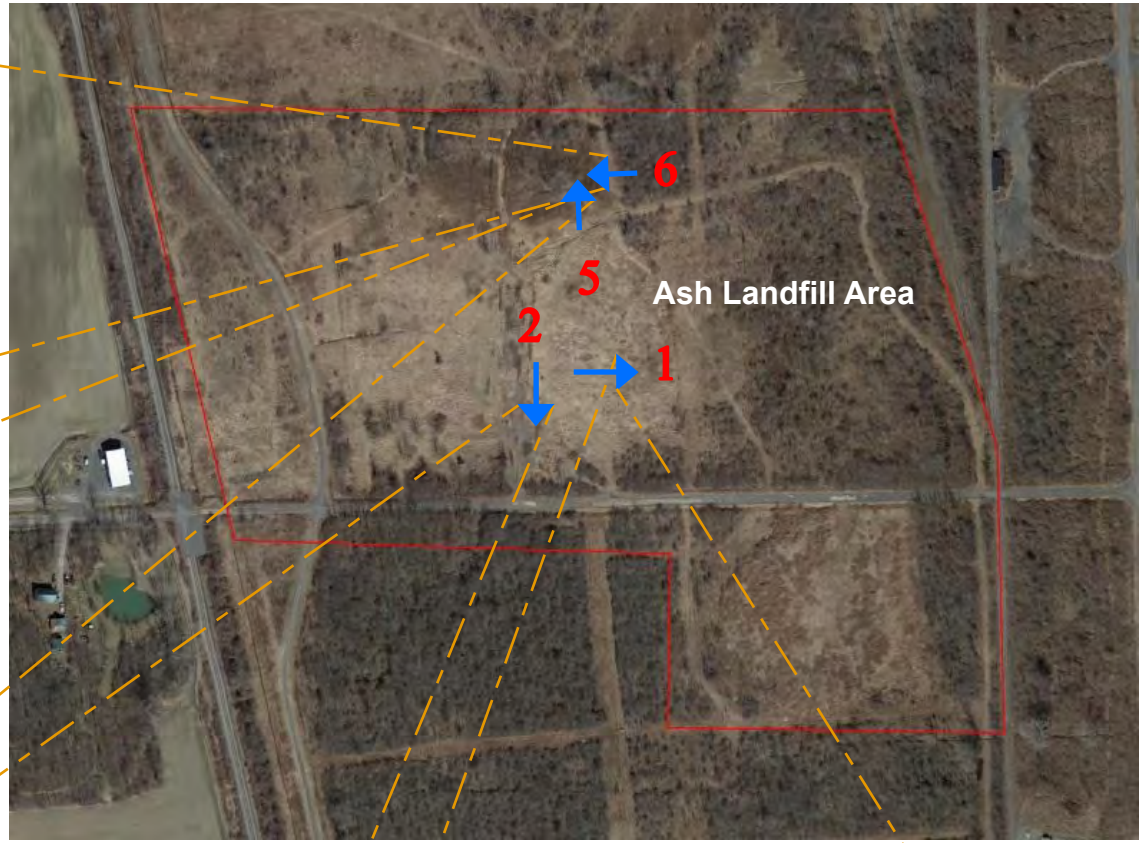
Ash Landfill Area
2025 LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:6/18/2024 3:07 PM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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AL-6

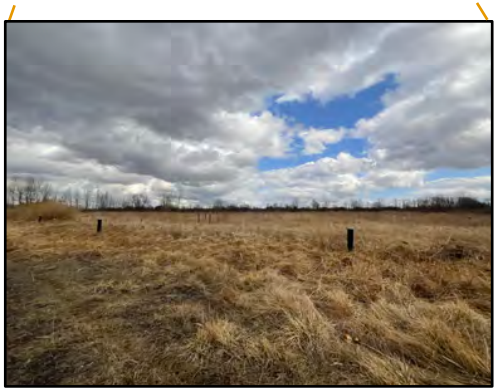




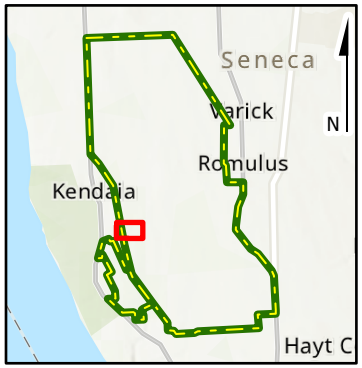
AL-5



AL-2



AL-1



Legend

- Former Depot Boundary
- Photo Viewing Direction

Ash Landfill Area cont.
2025 LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:6/18/2024 3:07 PM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 3, 6, 8, 14, 15	**Date of Inspection:**	02-02-2026
Location and Region:	Farming Area	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No inhabitable structures present.
No apparent groundwater use or access.
LTM groundwater monitoring in place.
No evidence or unauthorized excavation.
Soil cap and/or vegetative cover maintained.

Observations:

Current Land Use
Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

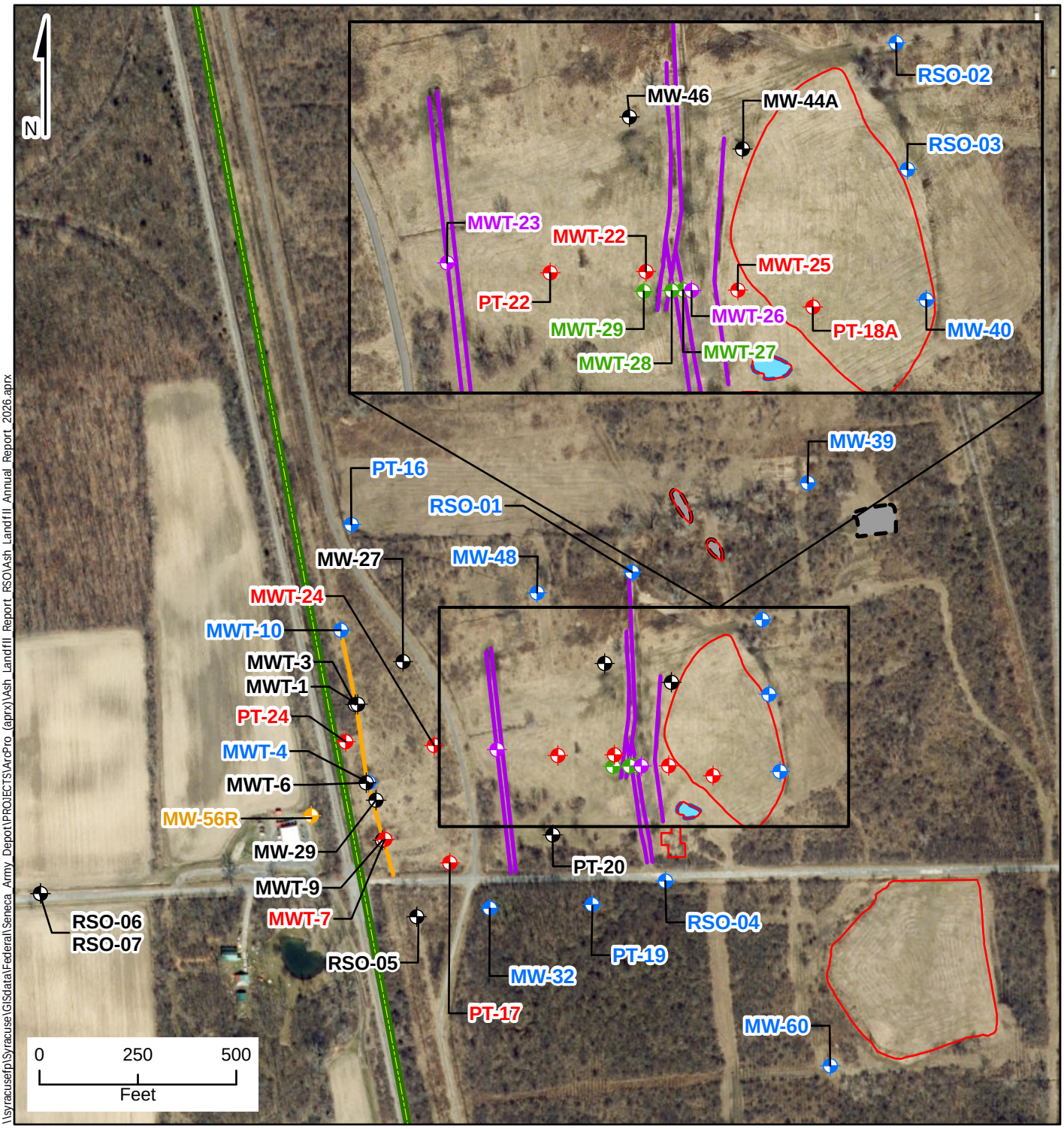
Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:
No signage

II. Interviews

Attachment 3

Ash Landfill Site Features





Legend

- SEAD Boundary
- Ash Landfill Operable Unit
- Former Debris Piles
- Former Cooling Pond
- Biowalls
- ZVI Wall

Monitoring Well Network

- Biowall Process Monitoring
- Long-Term Plume Monitoring
- Long-Term Plume/Biowall Process Monitoring
- Off-Site Performance Monitoring
- Additional RSO Sampling
- Gauge Only

Ash Landfill Site Features

Seneca Army Depot (SEAD)
Romulus, Seneca County, New York

Map Date: 7/1/2026
Projection: NAD 1983 2011 State Plane New York Central FIPS 3102 Ft US

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Appendix AA

Airfield Parcel (SEAD-122B and SEAD-122E)

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APPENDIX AA: AIRFIELD PARCEL (SEAD-122B AND SEAD-122E)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-122B – Small Arms Range (SAR) located on the Airfield Parcel along Route 96A was previously used by the Air Force, Navy, and Army as a small arms qualification ground. The Airfield SAR is located in the southwest corner of SEAD adjacent to the SEAD Airfield. The SAR consists of two contiguous bermed small arms ranges: one previously used for small arms training, and the second previously used for machine gun targeting (USACE 2007a). The firing line areas were suspected to contain UXO, high lead concentrations, and possibly other high metal concentrations.

SEAD-122E is associated with the deicing of planes at three separate aircraft refueling areas at the former SEAD Airfield. The property was active from 1942 until it was officially closed in 2000 but is currently utilized by the New York State Police for training and special events. All three of the historical deicing/refueling pads that comprise SEAD-122E are located along the western side of the northwest-southeast runway. Two of the deicing/refueling pads are located near either end of the runway, while the third is located at the end of a short taxiway, west of the central portion of the runway. In 2017, USACE launched an SI at SEAD-122E (and SEADs-25 and 26) to evaluate for suspected PFAS contamination, and 24 monitoring wells were sampled at SEAD-122E. During the SI, concentrations of the two primary PFAS constituents, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS), were measured below the former EPA lifetime health advisory (HA) level in all 24 of the wells installed and sampled at SEAD-122E (USACE 2018). Following a 2022 comparison to updated state maximum contaminant levels (MCL) and Office of the Assistant Secretary of Defense (ASD) guidance The PFAS investigation at SEAD-122E has proceeded to the RI stage. Due to its close proximity to SEAD-122E, SEAD-122B is also being investigated as part of the RI (USACE 2023).

Initial Response

The investigative work at SEAD-122B included an EBS in 1998, an initial site investigation in 2002, and a treatability study in 2004. As part of the 2004 treatability study, approximately 500 cy of soil was excavated from locations where high concentrations of total lead were found during the 2002 investigation in the larger of the two SARs. Other metals detected at levels above their respective NYSDEC cleanup objective levels were collocated within the areas where high lead concentrations were found. The excavation area was delineated by elevated lead concentrations greater than 400 ppm and included the western face of the backstop berm and a drainage swale that carried surface water runoff away from the firing range area. The top three inches of soil on the surface of the firing range's floor were also excavated. The final results reported confirm that all excavated locations exhibited lead concentrations at levels less than 400 ppm.

The investigative work at SEAD-122E included an EBS that was performed in 1998 and 1999 (USACE 1999b).

Basis for Taking Action

Due to human health risk in soil an action was required at SEAD-122E to ensure land use remains protective of site users. A risk assessment was not performed for SEAD-122B. SEAD-122B and SEAD-122E are located in the Former Airfield County Fire Training & Factory area.

Contaminants of Concern

At SEAD-122B, TAL metals analysis indicated lead concentrations well above the TAGM SCO. In addition, antimony, arsenic, copper, silver, sodium, thallium, and zinc were detected at concentrations slightly over the SCOs. One TCLP lead concentration was above the RCRA limit of 5,000 µg/L. The Synthetic Precipitation Leaching Procedure metals results indicated that there were levels of antimony, iron, and thallium above the NYSDEC Class GA groundwater standards. The maximum detected concentrations of iron and thallium were consistent with SEAD background levels. Groundwater was found to not be impacted by contact with or contaminant migration from the SAR soil (USACE 2004f).

For SEAD-122E, the Final EBS Report was issued to EPA and NYSDEC in May 1999 (USACE 1999b). The constituents of concern are SVOCs and principal components of deicing fluids (alcohols/glycols, i.e., ethylene glycol, propylene glycol, total unknown alkanes) in soil and groundwater. No deicing chemicals (e.g., glycols) were detected in any of the six soil samples characterized during this event. None of the compounds detected in the four groundwater samples exceeded groundwater standards.

PFAS constituents are being investigated as part of an RI. These constituents were identified after the ROD was completed. The investigation of SEAD-122B and SEAD-122E for PFAS is ongoing at this time.

Human Health and Ecological Risk Assessment

A risk assessment was not performed for SEAD-122B, where the results of the treatability study indicated that the cleanup objectives established for the treatability study had been achieved and all lead concentrations remaining at the AOC were below the EPA's guidance value for residential soils.

For SEAD-122E, the risk assessment concluded that at SEAD-122E the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} for the industrial worker and the construction worker. The cancer risk values for the day care center worker and day care center child, 2×10^{-4} and 1×10^{-4}, respectively, are above or at the acceptable level. The unacceptable cancer risk is due to dermal contact to soil and ingestion of soil. The contributing COCs are cPAHs in soils. A summary of the risk assessment results is presented in Table 7-15 of the ROD (USACE 2007a). The calculated non-cancer HI for all receptors are less than 1.0.

For comparison purposes, risk to residential receptors was evaluated. The non-cancer HIs were less than 1. Cancer risk values were above EPA acceptable limits due to the presence of cPAHs in the soil.

Ecological risk assessments were not performed for SEAD-122B or SEAD-122E.

There are no known completed groundwater exposure pathways at these sites.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Seventeen SWMU Requiring Land Use Controls (SEADs 13, 39, 40, 41, 43/56/69, 44A, 44B, 52, 62, 64B, 64C, 64D, 67, 122B, and122E)* signed on 3 July 2007 required the establishment of ICs at the two sites (SEADs 122B and 122E) comprising the area known as the Airfield Parcel required the establishment of an IC. The elements that composed the remedy included:

- Establishing, maintaining, monitoring, and reporting on an LUC that prohibits residential housing, elementary and secondary schools, childcare facilities and playgrounds until unrestricted use and unlimited exposure criteria are attained within the AOCs.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 2 expanded the LUC RD from the PID area to include sites that are in the area formerly known as the Conservation Area and the Airfield parcels and applied the SEAD LUC RD enforcement provisions to SEADs 122B and 122E.

An Environmental Easement for the PID/Warehouse Area (expanded to include the Airfield parcel) was recorded in the Seneca County Clerk's office on 9 July 2009. A summary of the ICs currently implemented at SEAD-122B and SEAD-122E is presented in **Table AA.2.1** based on the data and risk presented in the ROD and the LUC RD.

SEAD-122B and SEAD-122E were transferred to the SCIDA with a Quitclaim Deed executed on 8 June 2009. The PID/Warehouse Area property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed for the PID/Warehouse Area incorporated by reference the land use restrictions set forth in the Environmental Easement.

As the selected remedies do not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AA.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Site Use	No(1)	Yes(2)	SEAD PID/Warehousing Area (including the Airfield Parcel)	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant

Notes:

(1) For SEAD-122B, results of the treatability study indicated that the cleanup objectives established for the treatability study had been achieved and all lead concentrations remaining at the AOC were below the EPA's guidance value for residential soils (USACE 2007a). For SEAD-122E, results of the Final EBS Report (USACE 1999b) and the 2017 ESI data show no COC exceedances in soil or groundwater.

(2) SEAD-122B and SEAD-122E are located within the airfield area where an area-wide IC is present. This IC prohibits use or access to groundwater and prohibits land use for residential housing, elementary and secondary schools, childcare facilities and playground activities. This site is physically located within the boundary of the airfield area, and therefore, the ICs are applied to this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AA.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AA.3.2**).

Table AA.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-122B and SEAD-122E	Protective	The remedy implemented for Airfield Parcel is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AA.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-122B and SEAD-122E	NA	Continue the implementation of LUCs and discuss lowering the frequency of periodic reviews with NYSDEC and EPA.	Partially completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, 2026. No new construction or access to, or use, of groundwater were observed. Lowering the frequency of periodic reviews was not discussed.	NA
SEAD-122B and SEAD-122E	NA	Re-evaluate the risk due to changes in the toxicity values (particularly the PAH toxicity values) to determine if UU/UE conditions can be met in soil at SEAD-122E.	Completed	Risk was re-evaluated in 2026 due to changes in toxicity values.	

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-122B and SEAD-122E were inspected on 3 February 2026, to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No prohibited facilities were present or had been constructed at the site and no access to, or use of, groundwater was evident.

Interviews

Since SEADs 122B and 122E are uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-122B and 122E.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the completed ROD for the Airfield Parcel have been completed and documented. Based on a review of the LUCs RD Addendum 2, Environmental Easement, transfer deed, and the FYR site visit conducted on 3 February 2026 the remedy is functioning as intended by the decision documents.

The selected remedy is still protective of human health and the environment because:

- The LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds ,and which also has been expanded to include land within the PID Area and Airfield parcel has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-122B and SEAD-122E. SEAD-122B and SEAD-122E is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy because LUCs are in place that prohibit the unrestricted use of both SEAD-122B and SEAD-122E.

For SEAD-122B, a cleanup level of 400 mg/kg was identified for lead in the treatability study and removal action. On 16 October 2025, the EPA updated guidance for evaluating residential lead exposures at CERCLA and RCRA sites (EPA 2025). While SEAD-122B is not a residential site, the EPA revised lead guidance lowered the target blood-lead level from 10 µg/dL to 5 µg/dL when evaluating lead in soil. The soil lead cleanup level is lower than the EPA industrial soil RSL (800 mg/kg), NYSDEC Restricted Use Commercial (1,000 mg/kg), and NYSDEC Restricted Use Industrial (3,900 mg/kg). Therefore, the soil removal based upon the soil lead cleanup level of 400 mg/kg is protective for commercial/industrial land use.

For SEAD-122E, soil COCs and cleanup levels were not identified in the ROD and the site was considered acceptable for commercial/industrial use (USACE 2007a). The risk assessment did not evaluate an unrestricted residential use but instead evaluated a potential daycare center child. Potential risk concerns were identified for a daycare center child. However, LUCs were placed on the site to prohibit an unrestricted use and exposure scenario. LUCs that prohibit the use of the site for unrestricted uses and exposures eliminates exposure pathways that are potential risk concerns.

PFAS have been detected at SEAD-122E in groundwater. Federal and state MCLs are now available for PFOS and PFOA, and detections at SEAD-122E exceeded those MCLs for PFOA. PFAS investigations are currently ongoing and impacts to site soil, groundwater, and surface water will be determined. The remedy remains protective in the short-term because LUCs placed on SEAD 26 limit unrestricted use and exposure receptors and use of groundwater. Additionally, the site is uninhabited and unoccupied so current exposures are not occurring.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

The PFAS investigation of SEAD-122B and SEAD-122E has proceeded to the RI and is ongoing at this time. The investigation shows early indicators of potential issues related to PFAS in groundwater. The remedy in place is for the contaminants identified in the ROD, which did not include PFAS as this contaminant had not been known at the time of the ROD. Further investigation is underway to determine if a remedy is needed for PFAS at this site.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEADs 122B and 122E. On-going remedial monitoring activities include periodic evaluations of the effectiveness of the remedy. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

A remaining issue at SEAD-122B and SEAD-122E is the detection of PFAS in groundwater and soil which warranted further PFAS investigation. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.
- Continue ongoing PFAS investigation.

PROTECTIVENESS STATEMENT

The remedy implemented for Airfield Parcel is protective of the environment and human health in the short-term. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

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Attachment 1

Photographic Log

122B-2



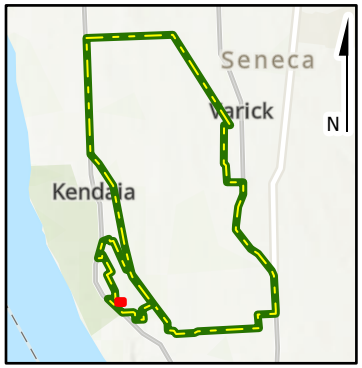
122B-3



122B-1







Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-122B
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US



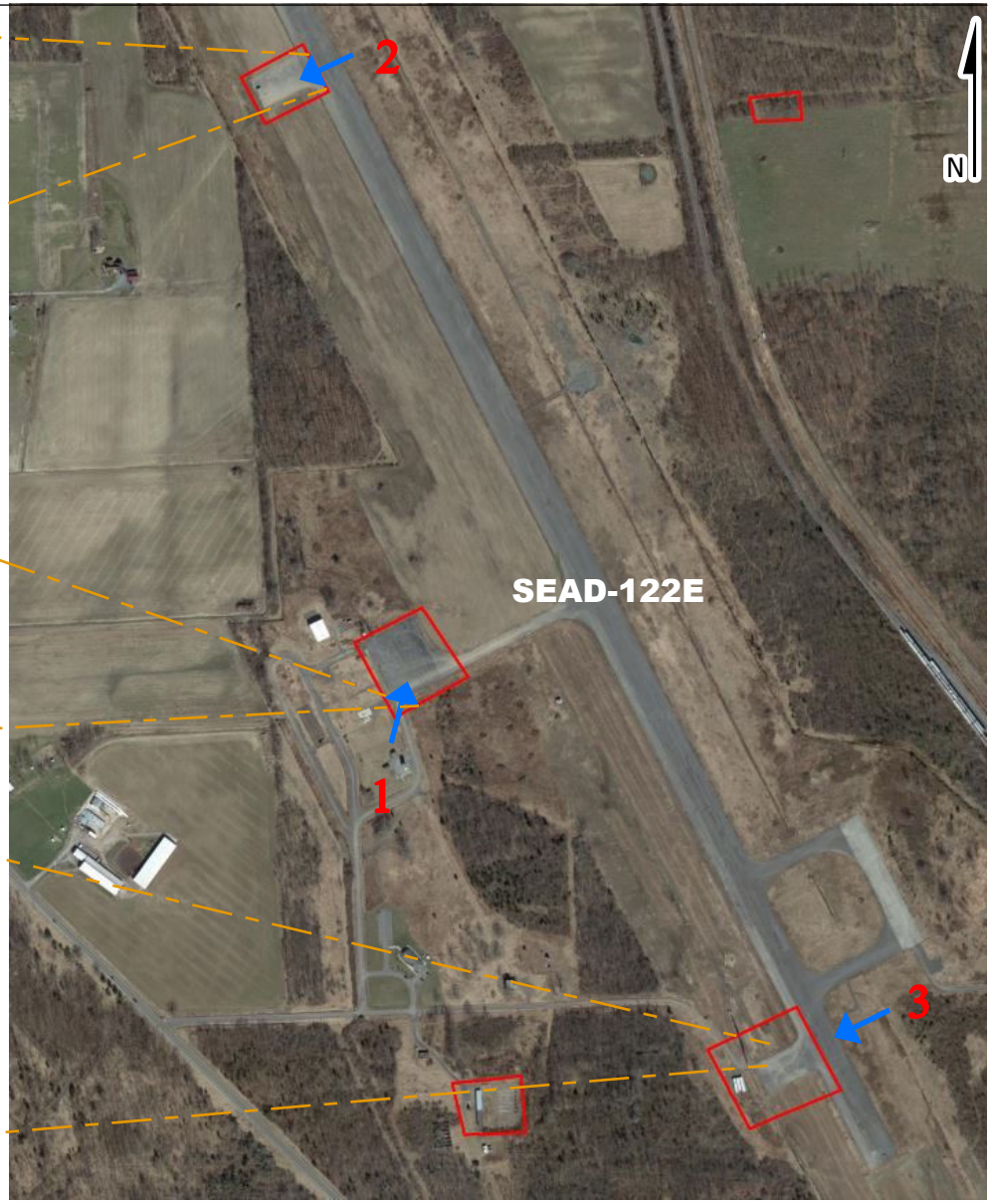
122E-2

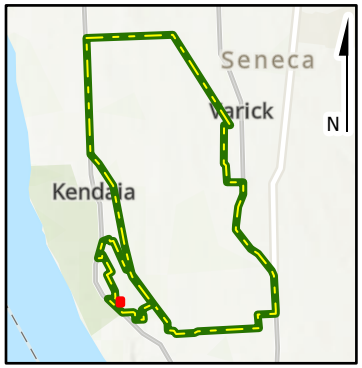


122E-1



122E-3





Legend

Former Depot Boundary

Photo Viewing Direction

SEAD-122E
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date:2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 122B	**Date of Inspection:**	02-03-2026
Location and Region:	Airfield Parcel	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present
No apparent groundwater use.

Observations:

Current Land Use

Vacant airfield

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 122E	**Date of Inspection:**	02-03-2026
Location and Region:	Airfield Parcel	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Sunny 20F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present
No apparent groundwater use.

Observations:

Current Land Use

Vacant airfield

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Appendix AB

SEAD-12: Radioactive Waste Burial Sites

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APPENDIX AB: SEAD-12 RADIOACTIVE WASTE BURIAL SITES

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Radioactive Waste Burial Site (SEAD-12) is located in the north-central portion of SEAD also known as the high security area and referred to as the "Q Area." The SEAD-12 remedial investigation covered 624 acres of the Q Area including the burial areas noted above. After the ESI, Building 715 and the portion of Reeder Creek adjacent to SEAD-12 were also included in the RI at SEAD-12. Building 715 is a wastewater treatment plant that received wastewater from the buildings within the Q Area during the period of use. Reeder Creek receives the surface water runoff from SEAD-12, and other locations within SEAD.

The contaminant sources at SEAD-12 were the military-related items and other debris associated with the historical waste burial activity within the AOC. Prior test pitting operations conducted as part of the SEAD-12 ESI and the SEAD-12 RI indicated that buried material contained in the burial pits included an undefined quantity of military-related debris, other conventional forms of debris (e.g., construction and demolition debris, miscellaneous debris, etc.), and fill material, all of which was covered by known thicknesses of native, overburden soil.

Initial Response

An ESI was conducted for SEAD-12A and SEAD-12B in 1994, and included the sampling and analyses of surface and subsurface soil, groundwater, surface water, and sediment. An RI was started at SEAD-12 in 1997 and the final RI Report was issued in 2002. The RI consisted of geophysical investigations; radiological investigations, including the building surveys mentioned above; a soil gas survey; test pitting; sampling and analysis of surface and subsurface soil, groundwater, surface water, and sediment; a baseline human health risk assessment; an ecological investigation; and a SLERA.

Analytical data collected during the 1995 ESI and 2002 RI are presented, summarized, and discussed for each potential release area in the SEAD-12 RI Report. Based on the investigation data and available documentation of activity associated with the former AOC operations, three potential release areas (i.e., the Former Dry Waste Disposal Pit, Disposal Pit A/B, and Disposal Pit C) were considered impacted to the greatest extent by former activities performed in the AOC. At two of these areas military-related items were identified during test pitting operations during the ESI and RI. Analytical data for conventional chemical and radiological contaminants identified in soil from each of these three areas were combined with AOC-wide analytical results for conventional chemical and radiological contaminants in surface water, sediment, and groundwater and used as the basis of the risk assessments for SEAD-12. Based on the conclusions in the RI, a supplemental RI was conducted in 2006 to further characterize the extent of TCE found in groundwater in the Buildings 813/814 area and the level of 210Pb present in the area of EM-5.

The radiological building survey conducted as part of the RI concludes that all buildings in SEAD-12 are in compliance with the NYSDEC cleanup guideline (i.e., 10 mrem/yr) identified in

the NYSDEC Cleanup Guidelines for Soils Contaminated with Radioactive Materials (DSHM-RAD-05-01). Results of the radiological building survey are presented in the Final Radiological Survey Report (USACE 2002d).

USACE performed a removal action during 2009 in the historical waste burial pits to excavate material contained within the pits and allow USACE to examine the contents so that military-related items could be identified, removed, and secured, pending any final demilitarization, dismantling, and disposal. Recovered military-related items were not found to coexist with conventional chemical hazardous substances at concentrations of particular concern, but in many cases the recovered military-related items did exhibit levels of residual radiation at levels in excess of regional background. A total of 5,433 tons of soil and comingled debris were disposed of at an off-site licensed landfill, 122 ton of material were recycled and 13.25 tons of military-related items with radiological residuals in excess of background levels were secured and disposed of at an off-site licensed low-level radioactive waste disposal site.

Basis for Taking Action

Because the potential for vapor intrusion was not evaluated within Buildings 813/814, an action was required at SEAD-12 to ensure land use remains protective of site users. SEAD-12 is located within an area of SEAD where the proposed future use was designated by the Local Redevelopment Authority as future institutional /training/commercial activity.

Contaminants of Concern

The contaminant sources at SEAD-12 were the military-related items and other debris associated with the historical waste burial activity within the AOC. The source of the TCE was remediated to the limit of the building foundation; however, no investigation was conducted under the building structure. The history of the previous TCE contamination is noted since the condition under the adjacent building is unknown. The areas of concern are where residual TCE-contaminated soil and where contaminated groundwater may exist. Table 6-1 of the ROD (USACE 2015a) presents a comparison of the ESI and RI soil analytical results to the NYSDEC Unrestricted Use SCOs and the EPA RSLs for Chemical Contaminants at Superfund Sites for residential soil.

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-12 for all future receptors under the institutional/training/commercial scenario the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and the calculated non-cancer HI for all receptors except for the industrial worker are less than 1. Table 7-1 in the ROD summarizes risks calculated for exposures to SEAD-12 impacted media (soil, groundwater, surface water, and sediment/ditch soil).

A potential risk is assumed to exist in the vicinity of the previously noted TCE contamination that was identified in the soil and groundwater in the immediate vicinity of Buildings 813/814 and former well MW12-37. Residual VOC contamination in soil does not pose a direct-contact hazard but has the potential to pose a future vapor intrusion exposure. With no future planned

use of Buildings 813/814, a risk assessment was not performed to evaluate potential risks via the indoor air exposure pathway. To assure that SEAD-12 will not pose a future unacceptable risk if Building 813 or 814 were to be occupied, or if any building overlying the current buildings' footprints or on adjacent land were to be constructed, an investigation of vapor intrusion potential and indoor air quality would be needed to assess and estimate potential risks from VOC vapor intrusion.

As part of the RI, a SLERA was conducted. The results of the SLERA indicate that soil, surface water, or sediment at SEAD-12 does not significantly impact ecological receptors in the area (i.e., short-tailed shrew, meadow vole, red-tailed hawk, great blue heron, mourning dove, largemouth bass, amphibian, and invertebrates). No COCs were identified for SEAD-12 soil, sediment, or surface water, and SEAD-12 does not pose significant risks to ecological receptors.

Results of the CERCLA risk assessment for SEAD-12 indicate that soil in the three most impacted areas (Disposal Pit A/B; Disposal Pit C; and the Former Dry Waste Disposal Pit) and other environmental media (groundwater, sediment, surface water) do not pose unacceptable risks to human health or ecological receptors based on the unrestricted use scenario.

USACE and EPA have determined that no further CERCLA action is warranted at any locations in SEAD-12, exclusive of the area underlying and surrounding Buildings 813/814 where a future vapor intrusion risk analysis would be warranted prior to occupation.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *The Radioactive Waste Burial Sites (SEAD-12) and The Mixed Waste Storage Facility (SEAD- 72)* (USACE 2015a) require the establishment of ICs. The elements that composed the remedy included:

- Implementation, monitoring, and maintenance of an environmental LUC restricting access to and use of the existing vacant Buildings 813/814 and the construction of inhabitable structures (temporary or permanent) above the area and within a 50-foot perimeter of Buildings 813/814 and 50-foot radius from MW12-37 where TCE-contaminated soil was previously identified, and where contaminated groundwater may exist.

- Implementation, monitoring, and maintenance of an LUC that prohibits access to and use of groundwater in the vicinity of Buildings 813/814.

- Prohibit the development and use of the property for residential housing, elementary and secondary schools, childcare facilities and playgrounds until soil and groundwater standards for unrestricted use and unlimited exposure are achieved.

Remedy Implementation

The LUC RD for SEAD-12 implemented the LUCs. The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehouse Area. Addendum 5 to the SEAD LUC RD added SEAD 12 in accordance with the SEAD LUC RD Supplementation provision.

USACE will maintain and enforce the LUCs until the concentration of hazardous substances in soil and groundwater are at such levels to allow for unrestricted use and exposure or until the property is transferred. The LUC will be implemented through an Environmental Easement which documents and transfers the LUC objectives and responsibilities to the future owners. The Environmental Easement will be recorded and identified in the Deed when the property is transferred. A summary of the ICs currently implemented at SEAD-12 is presented in **Table AB.2.1** based on the data and risk presented in the ROD and the LUC RD.

The Environmental Easement, the implementing document granted upon property transfer out of federal ownership, will state that the future property owner will perform an investigation of vapor intrusion potential and indoor air quality with the results of the surveys reviewed and approved by USACE, EPA, and NYSDEC before the buildings, or any newly constructed buildings in the designated area may be occupied. The groundwater access and use restriction, established by the Environmental Easement, will be maintained and in effect until a future property owner demonstrates with new analytical data provided to, and approved by USACE, EPA, and NYSDEC to indicate that groundwater in the LUC-zone (e.g., vicinity of Building 813 and 814, and former well MW12-37) meets GA groundwater standards.

As the selected remedies do not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AB.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil Vapor	Yes	Yes	Within a 50-foot perimeter of Buildings 813/814 and 50-foot radius from monitoring well MW12-37 ("LUC-zone")	Prohibit the use of existing Buildings 813 and 814 and/or the construction of new inhabitable structures (temporary or permanent)	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
Soil	Yes	Yes	SEAD-12	Restrict site use.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.
Groundwater	Yes	Yes	LUC-zone	Prohibit access to and use of the groundwater in the LUC-zone	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AB.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AB.3.2**).

Table AB.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-12	Protective	The remedy implemented for SEAD-12 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AB.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-12	N/A	Continue the implementation of LUCs and the annual frequency of periodic reviews;	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, and 2026. No new construction or access to, or use, of groundwater were observed.	N/A
SEAD-12	N/A	Perform vapor intrusion study to assess and estimate potential risks for VOC vapor intrusion exposure in the event that Building 813 or 814 were to be occupied, and possibly remove the associated LUCs.	Not completed	A vapor intrusion study was not conducted.	N/A

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-12 was inspected on 3 February 2026 to assess whether required LUCs imposed by the approved RODs are being maintained. FYR-site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- Buildings 813/814 were not occupied.
- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-12.
- No apparent access to or use of groundwater was observed at SEAD-12.

Interviews

Since SEAD-12 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-12.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD-12 have been completed and documented. No continuing active remediation is required at SEAD-12. Based on a review of Closure Reports, LUC RD, Environmental Easement, transfer deeds and FYR site visit conducted 3 February 2026 all remedies are functioning as intended by the decision documents.

The remedy implemented at the SEAD-12 is currently protective of human health and the environment because:

- An LUC that prevents access to, and use of, groundwater at the SEAD-12 LUC-zone has been implemented and is currently being maintained, monitored and reported upon periodically The LUC-zone includes a small portion of SEAD-12 being the area equal to i) 50 feet from the perimeter of Building 813/814 and ii) 50 feet from monitoring well MW12-37 where contamination by VOCs, primarily TCE, is at levels exceeding federal and state groundwater drinking water standards and state SCO levels. VOCs remain at sufficient concentration to pose a potential risk via vapor intrusion to future users or occupants of the buildings or land.

- A second LUC that prevents the use of existing Buildings 813 and 814 and/or the construction of new inhabitable structures (temporary or permanent) above the area where there is the potential for TCE contaminated groundwater and/or soil, until a vapor intrusion study is conducted in the building(s) or in the restricted area and shows that potential risks from VOC intrusion does not pose unacceptable risk or hazard levels to future users or occupants of the structures or the land.

- A third LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds at SEAD-12 has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-12. SEAD-12 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three

FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. The changes described in this section are not expected to alter the protectiveness of the remedy because LUCs are in place that prohibit the unrestricted use of SEAD-12, prohibit construction of habitable structures, and prohibit groundwater use.

Potential risk concerns were not identified at the site, except for potential concerns with TCE associated with vapor intrusion and groundwater use in a limited area near Buildings 813/814. LUCs eliminate the exposure pathways of concern. The remainder of the site was considered acceptable for all uses (USACE 2015a). Numerical cleanup levels were not set forth in the ROD. Groundwater use restrictions will remain in effect until contaminant levels are below NYS 6 NYCRR Part 703 Water Quality Criteria for GA groundwater. Additionally, restrictions on building use or construction will be lifted when a vapor intrusion analysis reveals acceptable risk levels. Because the LUCs have been implemented, there are no changes to exposure pathways or land use at the site and no new human routes of exposure identified. Therefore, there are no site conditions that would impact the RAO and remedy protectiveness.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-12. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-12 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log

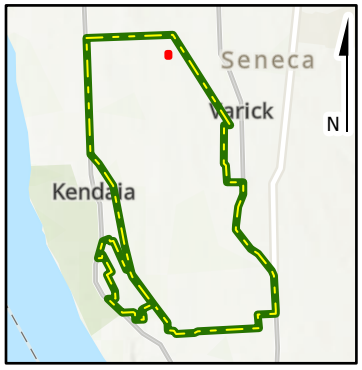


12-1



12-2





Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-12
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 12	**Date of Inspection:**	02-03-2026
Location and Region:	Data Storage/Telecommunications	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present.
No apparent groundwater use.
No inhabitable structures present.

Observations:

Current Land Use

Vacant building

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☑ Yes ☐ No ☐ NA

If no, describe:

II. Interviews

Appendix AC

SEAD-46: Small Arms Firing Range (Former 3.5-Inch Rocket Range)

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APPENDIX AC: SEAD-46 SMALL ARMS FIRING RANGE (FORMER 3.5-INCH ROCKET RANGE)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Small Arms Range (SEAD-46), also known as the "3.5-inch Rocket Range", is a trapezoidal-shaped parcel of land that encompasses approximately 68 acres. From the 1940s to the 1960s, SEAD-46 was used as a function test range for 3.5-inch rocket motors. The AOCs southern boundary is located approximately 6,000 feet north- northwest of SEAD's main gate off of State Highway 96. The predominant feature in the area is a man-made earthen berm that is situated near the northwest corner of the AOC; the berm served as a protective barrier during range operations.

The contaminant sources at SEAD-46 were the military-related items and other debris associated with munitions testing and disposal activities within the AOC. SEAD-46 was used as a 3.5-inch Rocket Range. Based on the findings of the OE Engineering Evaluation/Cost Analysis (EE/CA), the likely use of the AOC was as a rocket motor function testing range and as such was suspected to contain munitions related debris (USACE 2004a).

Initial Response

Geophysical surveys and intrusive investigations were first conducted over roughly 17.5 acres of SEAD-46 in 2000 and 1,155 anomalies were identified and investigated; 478 items were identified as munitions debris (MD) and 10 items were identified as MPPEH.

A Geophysical Investigation was conducted in April 2005 at SEAD 46. Approximately 24 acres were digitally mapped. A total of 98 anomalies were intrusively investigated and removed. The results of this investigation discovered 32 aluminum MD, 6 ferrous MD, and 60 cultural debris (CD). No MPPEH items were found.

Finally, in 2006 a munitions response investigation of SEAD-46 detected 2,054 geophysical anomalies. Of the anomalies found, 16 were identified as suspected MPPEH. No identifiable complete or partial 3.5-inch rockets or rocket motors were found during the 2006 investigation. All items that posed a potential explosive hazard were disposed by detonation as part of the final process to make the items inert. All MD and scrap metal was inspected and certified as material documented as safe prior to transport off-site as non-hazardous scrap metal. Based on the results of this investigation and past investigations, SEAD-46 is considered to be clear of MPPEH and no further geophysical or munitions response action is needed.

Basis for Taking Action

The contamination to be addressed at SEAD-46 is related to the potential for munitions of explosive concern (MEC) hazards that may remain undetected at the AOC at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Based on the outlined munitions response actions performed by USACE, the

Munitions Response Completion Report concluded that SEAD-46 is free of detected anomalies. Notwithstanding this determination, there is a possibility given the prior use SEAD-46 that MEC may be encountered on the property in the future.

The remedy proposed for the Munitions Response Sites is needed because there is the potential that MEC may remain undetected at the sites at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Current characterizations of the environmental media in the four munitions response AOCs indicates that residual levels of hazardous substances and other chemical pollutants and contaminants are not sufficient to warrant any further mitigation or remediation efforts.

Contaminants of Concern

No COCs were identified in soil samples collected from SEAD-46.

Human Health and Ecological Risk Assessment

Projected non-carcinogenic HIs for the park worker and the recreational child visitor at SEAD--46 are below the CERCLA limit of 1; projected non-carcinogenic HIs for the construction worker, adult resident, and resident child are above 1. Non-carcinogenic HIs for the construction worker and the adult and child residential receptors are estimated to be above the CERCLA limit; however, for each receptor the elevated HI is attributed to SEAD-46 contaminant exposure point concentrations that are consistent with or below residential or unrestricted use guidance limits or standard levels and identified background concentrations. The elevated HI is due to exposure to metal contaminants: manganese, iron, arsenic, cobalt, aluminum and thallium. Projected carcinogenic risks for all receptors, with the exception of the lifetime resident, are within the CERCLA risk range (i.e., 1×10^{-4} to 1×10^{-6}). The carcinogenic risk estimated for the lifetime resident (1.2×10^{-4}) is estimated to be above the EPA's acceptable upper limit (1×10^{-4}) but results primarily (1.1×10^{-4} out of 1.2×10^{-4}) from the intake of arsenic in groundwater. However, the concentration of arsenic measured in groundwater at SEAD-46 is below the EPA MCL and the State of New York's GA groundwater standard for arsenic. As such, the cancer risk level for the SEAD-46 lifetime resident overestimates the actual risk that exists at the site. Therefore, environmental conditions at SEAD-46 do not pose an unacceptable level of risk to future receptors.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Final Record of Decision, SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007- R-01 (Seneca AD Munitions Response Sites) and SEAD-70, Seneca Army Depot Activity* (USACE 2017) requires the establishment of ICs. The elements that composed the remedy included:

- Prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities, or playgrounds through the use of LUCs

- Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Munitions Response Sites

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 6 to the SEAD LUC RD added SEAD-46, SEAD 003-R-01 [SEAD-57]), SEAD 002-R-01, and SEAD 007-R-01 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the SEAD-46 property was recorded in the Seneca County Clerk's office on 10 June 2011. SEAD-46 was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed incorporated by reference the land use restrictions set forth in the Environmental Easement. A summary of the ICs currently implemented at SEAD-46 is presented in **Table AC.2.1** based on the data and risk presented in the ROD and the LUC RD.

As the selected remedy does not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AC.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use	Yes	Yes	SEAD-46	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
MEC	Yes	Yes	SEAD-46	Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Seneca AD Munitions Response Sites..	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AC.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AC.3.2**).

Table AC.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-46	Protective	The remedy implemented for SEAD-46 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AC.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-46	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews.	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, 2026.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-46 was inspected 3 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-46.

Interviews

Since SEAD-46 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-46.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD-46 have been completed and documented. No continuing active remediation is required. Based on a review of LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-46 is currently protective of human health and the environment because:

- An LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-46. SEAD-46 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. The changes described in this section are not expected to alter the protectiveness of the remedy for SEAD-46. Risk concerns were identified for the use of groundwater as a tap water supply. Arsenic was the primary contributor to these risk concerns. In January 2025, EPA updated the cancer slope factor and noncancer reference dose for inorganic arsenic. Both the cancer slope factor and noncancer reference dose were significantly reduced. This reduction in the toxicity

values would result in higher potential cancer risk levels and noncancer hazards for use of groundwater as a tap water supply. Potential risk concerns were identified in the risk assessment; therefore, the overall conclusions of the risk assessment would not change. The risk assessment noted that the concentration of arsenic in groundwater was below the EPA MCL and the State of New York's GA groundwater standard. Therefore, no chemicals of concern were identified, and no cleanup levels were set forth for SEAD-46. An LUC has been placed on the site that prohibits residential housing, elementary or secondary schools, childcare facilities, or playgrounds due to the potential presence of MEC. As a result, the RAOs and the remedy are considered valid and protective.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the RODs for SEAD-46. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-46, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

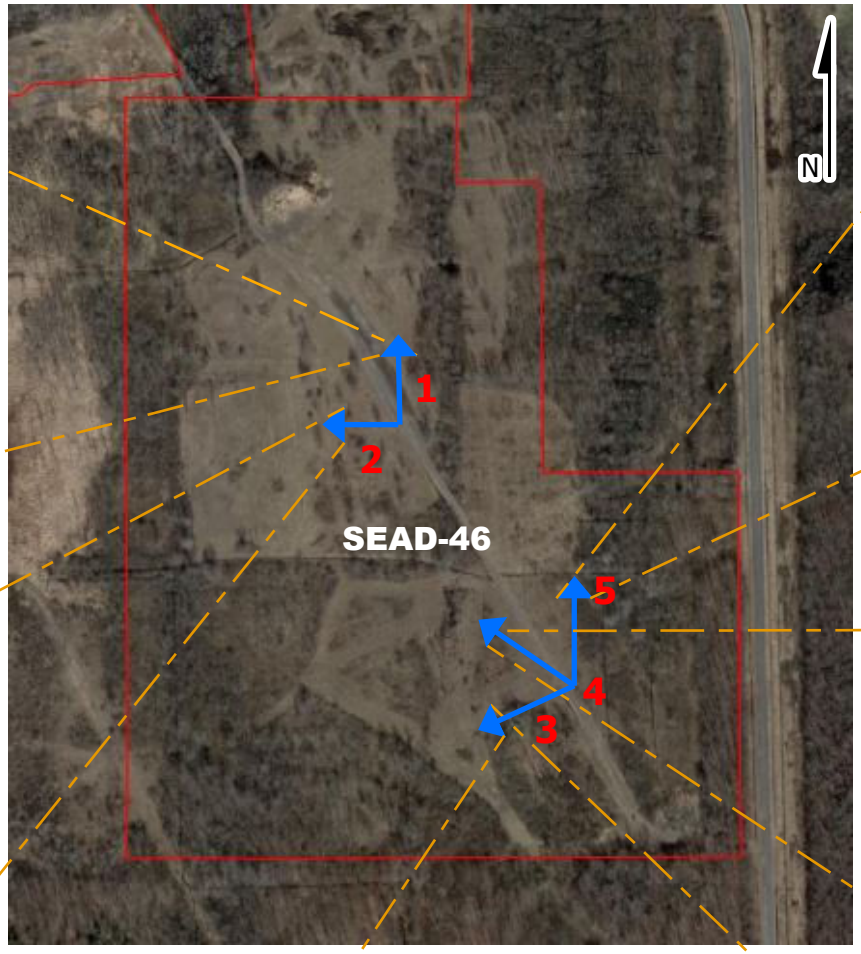
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-46 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





46-1



46-5



46-2



46-4



46-3



Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-46
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections Site Inspection Checklist

I. Site Information

Site Name:	SEAD 46	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. 3R training program in place.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix AD

SEAD 003-R-01: Explosive Ordnance Disposal (EOD) Range 1

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APPENDIX AD: SEAD 003-R-01: EXPLOSIVE ORDNANCE DISPOSAL (EOD) RANGE 1

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-003-R-01 (SEAD-57, the former Explosive Ordnance Disposal Area [formerly referred to as EOD-1]), is a rectangular parcel of land that encompasses approximately 72 acres in the west-northwest portion of SEAD. SEAD-003-R-01 is adjacent to the southernmost portion of the OB/Open Detonation (OD) Grounds that occupy most of the land in the northwestern corner of SEAD. For more than 20 years, the 143rd Ordnance Detachment, a Department of the Army tenant organization at SEAD, performed ordnance and explosives disposal and training at SEAD 003-R-01. The area was used by EOD personnel for the disposal of and training with conventional ammunition or explosives weighing less than 5 pounds.

The contaminant sources at SEAD 003-R-01 were the military-related items and other debris associated with the explosive disposal within the AOC.

Initial Response

As part of the OE EE/CA (USACE 2004a), geophysical surveys and intrusive investigations were conducted at SEAD-003-R-01. Twenty-three percent (23%) of the AOC were mapped, 1,700 anomalies were investigated and 950 recovered items were classified as MD. Three of these were determined to be MEC. The three items were one MK2 grenade and two 20-mm projectiles. During the surface sweep for the EE/CA, a 37-mm armor piercing high explosive item was found near the abandoned ammunition disassembly area across the road from the AOC.

During the Geophysical Investigation of SEAD-003-R-01 in April 2005, approximately 22.5 acres of the AOC were digitally mapped. During the investigation, 75 anomalies were intrusively investigated. Four MPPEH items were found and reclassified as MD following venting.

SEAD-003-R-01 was also investigated intrusively during 2006 during which 47 items were classified as MPPEH. All but two were classified as MD following explosive venting. The two MEC items were suspected EOD training items. A soil analysis was conducted and determined that the soil at SEAD-003-R-01 has not been adversely impacted by historical operations and activities performed at this AOC. USACE believes that the analytical results developed from the soil samples collected demonstrates that the soil remaining at the AOC is consistent with the clean-up goals established prior to the beginning of the work at SEAD-003-R-01. Therefore, no further action is needed as approved by EPA and NYSDEC.

Basis for Taking Action

The contamination addressed at SEAD-003-R-01 is related to the potential for MEC hazards that may remain undetected at the AOC at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Based on the outlined munitions response actions performed by USACE, the Munitions Response Completion

Report concluded that SEAD-003-R-01 is free of detected anomalies. Notwithstanding this determination, there is a possibility given the prior use SEAD-003-R-01 that MEC may be encountered on the property in the future.

The remedy for the Seneca AD Munitions Response Sites is needed because there is the potential that MEC may remain undetected at the sites at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Current characterizations of the environmental media in the four munitions response AOCs indicates that residual levels of hazardous substances and other chemical pollutants and contaminants are not sufficient to warrant any further mitigation or remediation efforts.

Contaminants of Concern

No COCs were identified in soil samples collected from SEAD-003-R-01.

Human Health and Ecological Risk Assessment

Estimated cancer risk levels for the park worker, the construction worker, and the recreational child visitor are all within the EPA acceptable range (i.e., 1×10^{-4} to 1×10^{-6}). Estimated non-carcinogenic hazard indices for the adult and child residential receptors at SEAD-003-R-01 are above the EPA acceptable limit of 1. The elevated HI is due to exposure to COPCs which include aluminum, manganese, arsenic, cadmium, cobalt, iron, thallium, vanadium, and antimony. Estimated cancer risk levels for the adult, child, and lifetime residential receptors at SEAD-003-R-01 are also within the EPA acceptable range (i.e., 1×10^{-4} to 1×10^{-6}) for carcinogenic risk. The risk assessment further analyzed the allocation of adult/child resident's non-carcinogenic HI to target organs/systems and looked at background concentrations and federal MCLs for groundwater. Based on risk assessments and risk management evaluations, performed in accordance with CERCLA guidance, residual concentrations of hazardous substances, pollutants, and contaminants are such that they are either consistent with, and undistinguishable from background; are present at levels that do not pose unacceptable risks or hazards to human health or the environment; or in the case of groundwater, levels are below state and federal MCLs.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Final Record of Decision, SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007- R-01 (Seneca AD Munitions Response Sites) and SEAD-70, Seneca Army Depot Activity* (USACE 2017) requires the establishment of ICs. The elements that composed the remedy included:

- Prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities, or playgrounds through the use of LUCs.

- Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Seneca AD Munitions Response Sites.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 6 to the SEAD LUC RD added SEAD-46, SEAD-003-R-01 [SEAD-57]), SEAD-002-R-01, and SEAD-007-R-01 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the SEAD-003-R-01 property was recorded in the Seneca County Clerk's office on 10 June 2011. SEAD-003-R-01 was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed incorporated by reference the land use restrictions set forth in the Environmental Easement. A summary of the ICs currently implemented at SEAD-003-R-01 is presented in **Table AD.2.1** based on the data and risk presented in the ROD and the LUC RD.

As the selected remedy does not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AD.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use	Yes	Yes	SEAD 003-R-01	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
MEC	Yes	Yes	SEAD 003-R-01	Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Seneca AD Munitions Response Sites.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AD.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AD.3.2**).

Table AD.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-003-R-01	Protective	The remedy implemented for SEAD-003-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AD.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-003-R-01	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews;	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, 2026.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD 003-R-01 was inspected 3 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-003-R-01.

Interviews

Since SEAD-003-R-01 is uninhabited and unoccupied, no interviews were conducted during the FYR process.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD 003-R-01 have been completed and documented. No continuing active remediation is required. Based on a review of LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD 003-R-01 is currently protective of human health and the environment because:

- An LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-003-R-01. SEAD-003-R-01 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, no risk concerns were identified for any receptors evaluated for the site. No chemicals of concern were identified, and no cleanup levels were set forth. An LUC has been placed on the site that prohibits residential housing, elementary or secondary schools, childcare facilities, or playgrounds due to the potential presence of MEC. As a result, the RAOs and the remedy are considered valid and protective.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-003-R-01. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-003-R-01, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.

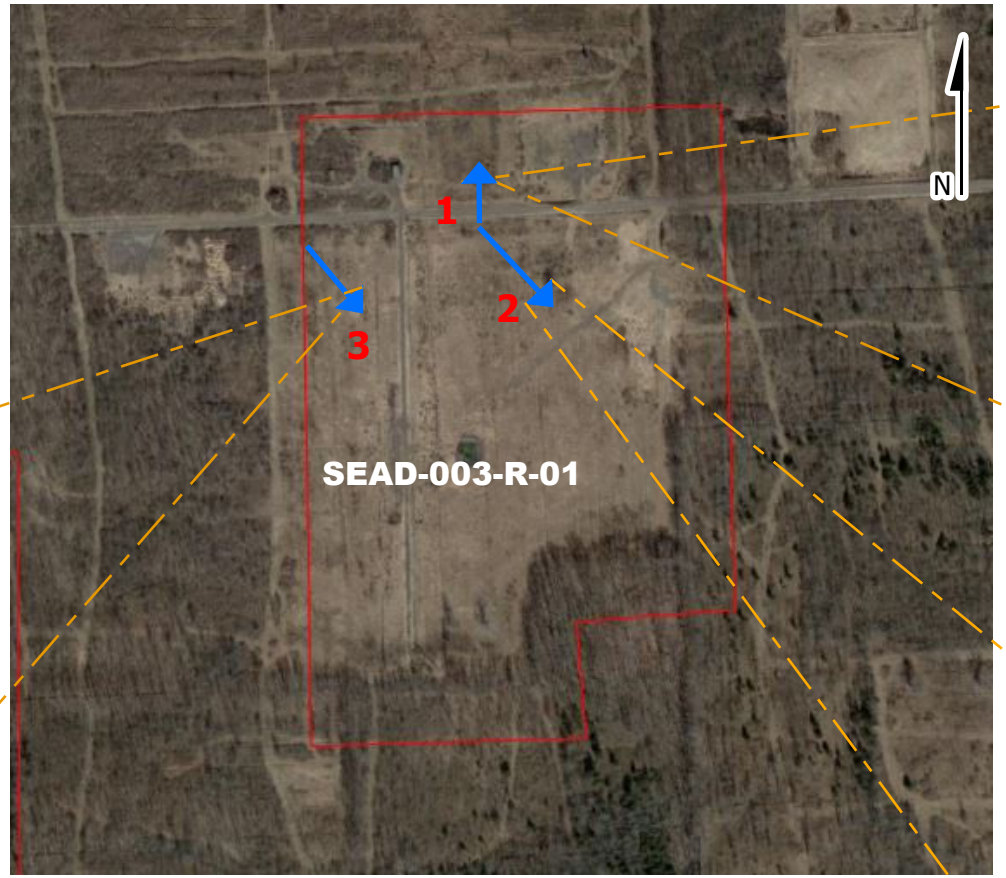
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-003-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





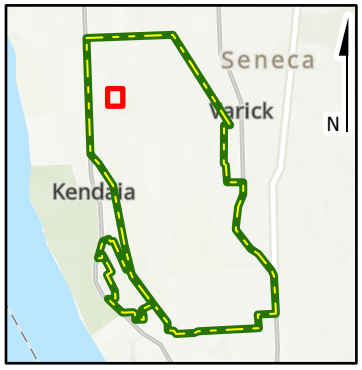
003-3



003-1



003-2



Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-003-R-01
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 003-R-01	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. 3R training program in place.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix AE

SEAD-007-R-01: Rifle Grenade Range

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APPENDIX AE: SEAD-007-R-01 RIFLE GRENADE RANGE

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The Grenade Range, which was constructed in the mid-1980s, encompasses approximately 28 acres of land in the northwestern portion of SEAD, to the west and southwest of SEAD-003-R-01. 40mm M781 (40-mm Low Velocity Practice Cartridge) and 35-mm M73 sub-caliber practice rockets were used at the Grenade Range during security forces' training. There is no record (or indication at the targets) that high explosive rounds were used.

The contaminant sources at SEAD-007-R-01 were the military-related items and other debris associated with the historical rifle grenade usage within the AOC. The range also contained wooden and armored vehicle targets; distance and boundary markers; and the range control tower. The Archives Search Report (ASR) (USACE 1998b) states that 40-mm M781 and 35-mm M73 sub-caliber practice rockets were used at the AOC for security forces training. There is no record (or indication at the targets) that high explosive rounds were used. Small arms (blanks) casings were reported to be present at the time of the ASR in 1998.

Initial Response

During the OE EE/CA, 15 acres was geophysically mapped at SEAD-007-R-01 using an EM-61 instrument. In addition to the 15 acres (65 grids), the EM61 and a wandering path methodology was used to sample 10% of the area between the firing line and the target area. The EE/CA investigated 865 DGM targets. This intrusive investigation resulted in 102 MPPEH items (101, 35-mm sub-caliber M73 and 1 Rifle Grenade M407A1, Practice) and numerous munitions debris items.

During the 2006 Munitions Response, 218 potential MPPEH items were detected at SEAD-007-R-01. All potential MPPEH items were related to the M73 Practice Rocket and 40mm practice grenade. Since none of the practice rockets found at SEAD-007-R-01 had intact motors, the practice rockets were reclassified as MD. However, since the M73 Practice Rockets potentially contained small, smoke emitting, bursting charges, all items were disposed by detonation as part of the final process to make the items inert. Based on the munitions response survey results, findings, quality control and quality assurance procedures performed at the AOC, SEAD-007-R-01 is considered to be cleared of MPPEH and no further action other than LUCs is required.

Basis for Taking Action

The contamination addressed at SEAD-007-R-01 is related to the potential for MEC hazards that may remain undetected at the AOC at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Based on the outlined munitions response actions performed by USACE, the Munitions Response Completion Report concluded that SEAD-007-R-01 is free of detected anomalies. Notwithstanding this determination, there is a possibility given the prior use SEAD-007-R-01 that MEC may be encountered on the property in the future.

The remedy for the SEAD Munitions Response Sites is needed because there is the potential that MEC may remain undetected at the sites at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Current characterizations of the environmental media in the four munitions response AOCs indicates that residual levels of hazardous substances and other chemical pollutants and contaminants are not sufficient to warrant any further mitigation or remediation efforts.

Contaminants of Concern

No COCs were identified in soil samples collected from SEAD-007-R-01.

Human Health and Ecological Risk Assessment

Projected carcinogenic risks for all receptors are within, or below, the EPA acceptable range (i.e., 1×10^{-4} to 1×10^{-6}). Projected non-carcinogenic HIs for all receptors, with the exception of the resident child's, at SEAD-007- R-01 are below the EPA preferred limit of 1. However, potential non-carcinogenic impacts to the child resident arising from exposure to soil at SEAD-007-R-01 cannot be differentiated from those that would occur due to soils at residential sites or to other background areas in the vicinity of SEAD. The risk assessment concluded that environmental conditions at the Grenade Range do not pose an unacceptable level of hazard or risk to Conservation/Recreation or Residential/Resort receptors.
An ecological risk assessment was not performed for SEAD-007-R-01.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Final Record of Decision, SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007- R-01 (Seneca AD Munitions Response Sites) and SEAD-70, Seneca Army Depot Activity* (USACE 2017) requires the establishment of ICs. The elements that composed the remedy included:

- Prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities, or playgrounds through the use of LUCs.

- Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the SEAD Munitions Response Sites.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 6 to the SEAD LUC RD added SEAD-46, SEAD-003-R-01 [SEAD-57]), SEAD-002-R-01, and SEAD-007-R-01 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the SEAD-007-R-01 property was recorded in the Seneca County Clerk's office on 10 June 2011. SEAD-007-R-01 was transferred to the SCIDA with a

Quitclaim Deed executed on 27 May 2011. The property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed incorporated by reference the land use restrictions set forth in the Environmental Easement. A summary of the ICs currently implemented at SEAD 007-R-01 is presented in **Table AE.2.1** based on the data and risk presented in the ROD and the LUC RD.

As the selected remedy does not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AE.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use	Yes	Yes	SEAD 007-R-01	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
MEC	Yes	Yes	SEAD 007-R-01	Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Seneca AD Munitions Response Sites.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AE.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AE.3.2**).

Table AE.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-007-R-01	Protective	The remedy implemented for SEAD-007-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AE.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-007-R-01	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews;	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, 2026.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-007-R-01 was inspected on 3 February 2026 to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD-007-R-01.

Interviews

Since SEAD-007-R-01 is uninhabited and unoccupied, no interviews were conducted during the FYR process.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD-007-R-01 have been completed and documented. No continuing active remediation is required. Based on a review of LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-007-R-01 is currently protective of human health and the environment because:

- An LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-007-R-01. SEAD-007-R-01 is currently monitored and reported annually. No significant changes in site conditions have been noted since the last FYR; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, no risk concerns were identified for any receptors evaluated for the site. No chemicals of concern were identified, and no cleanup levels were set forth. An LUC has been placed on the site that prohibits residential housing, elementary or secondary schools, childcare facilities, or playgrounds due to the potential presence of MEC. As a result, the RAOs and the remedy are considered valid and protective.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-007-R-01. There have been no changes in the physical condition of the site

that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-007-R-01, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-007-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log



007-1





007-2



Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-007-R-01
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

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Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 007-R-01	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. 3R training program in place.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Erosion Noted?	☐ Yes	☑ No	☐ NA
If yes, describe:			
Adequate Signage?	☑ Yes	☐ No	☐ NA
If no, describe:			

II. Interviews

Appendix AF

SEAD-002-R-001: East EOD Ranges (Former EOD Area 2 and EOD Area 3)

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APPENDIX AF: SEAD-002-R-001 EAST EOD RANGES (FORMER EOD AREA 2 AND EOD AREA 3)

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

SEAD-002-R-01 includes two separate areas, EOD-2 and EOD-3, which are located in the northeastern portion of SEAD in the vicinity of Duck Pond and SEAD-46. EOD-2 encompasses approximately 3 acres of land on the southwestern shore of the Duck Pond. This area is west-northwest of SEAD-46 and southeast of the intersection of Fayette Road and East-West Baseline Road. The 1998 ASR (USACE 1998b) states that explosive devices were used in EOD-2 and that non-explosive projectiles were disposed near the Duck Pond. EOD-3 encompasses approximately 4 acres of land approximately 250 feet north of the earthen protective barrier berm in SEAD-46. EOD-3 was a former EOD disposal area.

The 1998 ASR states that explosive devices were used in this area. COCs are the military related items and other debris associated with the historical explosive usage within the AOC.

Initial Response

As part of the OE EE/CA, geophysical surveys and intrusive investigations were conducted in 2000 at EOD Areas 2 and 3 (SEAD-002-R-01). Forty-six percent (46%) of the 5-acre EOD-2 Area was surveyed and 87 anomalies were investigated. Six of the items were MD and one item was munitions and explosives of concern (MEC). All items were found in the upper three inches of the soil. A total of 80% of the 5-acre EOD-3 Area was surveyed and 64 anomalies were investigated. Thirteen of the items were MD and no items were classified as MEC.

In 2006 two suspected MPPEH items were found in the EOD-2 portion of SEAD-002-R-01. Both items were explosively vented to make them inert. No MPPEH items were found within EOD-3. Additionally, a soil analysis determined that the soil at SEAD-002-R-01 had not been impacted by any historical operations and as a result no further action was needed.

Basis for Taking Action

The contamination to at SEAD-002-R-01 is related to the potential for MEC hazards that may remain undetected at the AOC at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Based on the outlined munitions response actions performed by USACE, the Munitions Response Completion Report concluded that SEAD-002-R-01 is free of detected anomalies. Notwithstanding this determination, there is a possibility given the prior use SEAD-002-R-01 that MEC may be encountered on the property in the future.

The remedy for the SEAD Response Sites is needed because there is the potential that MEC may remain undetected at the sites at locations that could not be identified using currently available geophysical and intrusive investigative and clearance technologies. Current characterizations of the environmental media in the four munitions response AOCs indicates that residual levels of

hazardous substances and other chemical pollutants and contaminants are not sufficient to warrant any further mitigation or remediation efforts.

Contaminants of Concern

No COCs were identified in soil samples collected from SEAD 002-R-01.

Human Health and Ecological Risk Assessment

Projected non-carcinogenic HIs for the park worker and the recreational child visitor at EOD-2 are below the EPA's preferred limit of 1; projected non-carcinogenic HIs for the construction worker, adult resident, and child resident are above the preferred limit. Projected carcinogenic risks for all receptors are within, or below, the EPA recommended range (i.e., 1×10^{-4} to 1×10^{-6}). Manganese is the COPC that is the largest contributor to both the adult's and child's elevated HI. Review of the EPC for manganese at EOD-2 suggests that the value used is elevated compared to soil concentrations found in approved background levels, but the EPC is still below the guidance concentrations identified as acceptable by the EPA for residential soil and by NYSDEC for unrestricted use. With reference to two other major COPCs (i.e., cobalt and iron), each of these is found in the soil at EOD-2 at concentrations that are below EPA residential soil RSL guidance values, and at concentrations that are below approved background levels. The EPC used for aluminum at EOD-2 is approximately 12.5% above the 95th UCL background soil concentration and still within the range of the dataset. This corresponds to an increased HI of 0.015 for the adult and 0.005 for the child resident. Both of these values are insignificant when compared to the level of uncertainty that is associated with the reference dose used for manganese. This suggests that the concentrations observed at EOD-2 are just as likely to be associated with natural soil, and not attributable to contamination that has occurred at the site due to its historical use.

Non-carcinogenic HIs for all receptors, with the exception of the resident child's, are below the EPA recommended limit of 1. Projected carcinogenic risks for Conservation/Recreation receptors (i.e., parker worker, construction worker, and recreation child visitor) and Residential/Resort receptors (adult, child and lifetime resident) are within, or below, the EPA acceptable range (i.e., 1×10^{-4} to 1×10^{-6}). As is noted, the EPC for each of the identified metals is below its listed EPA RSL for residential soil. The EPC for manganese is also below its respective New York unrestricted use SCO value, and the EPC used for cobalt and iron are lower than approved 95th UCL background soil concentrations. The hazard quotient derived for manganese is overly conservative as it is based on inhalation of manganese dioxide, which is not the only form of manganese that is likely to be found at the site. Aluminum again is observed at an EPC that is about nine percent higher than its background soil 95th UCL concentration and again within the range of the dataset, but for the child resident this only amounts to a potential HI increase of 0.04, which is insignificant when compared to the uncertainty that is associated with the HI determined for manganese. Therefore, the observed risk associated with metals at EOD-3 is due to approved background conditions and cannot be distinguished from effects that may be associated with the natural setting at the Depot. Thus, it is likely that the elevated non-carcinogenic hazard for the resident child overestimates the hazards that actually exist at EOD-3. The observed risks associated with metals at EOD-3 are due to background conditions and are not associated with any site contamination.

An ecological risk assessment was not performed for SEAD-002-R-001.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Final Record of Decision, SEAD-46, SEAD 003-R-01 (SEAD-57), SEAD 002-R-01 and SEAD 007- R-01 (Seneca AD Munitions Response Sites) and SEAD-70, Seneca Army Depot Activity* (USACE 2017) requires the establishment of ICs. The elements that composed the remedy included:

- Prohibits the development or use of the property for residential housing, elementary and secondary schools, childcare facilities, or playgrounds through the use of LUCs; and

- Requires USACE (or USACE contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the SEAD Munitions Response Sites.

Remedy Implementation

The LUC RD for SEAD 27, 66, and 64A ("SEAD LUC RD") implemented LUCs for the entire SEAD PID/Warehousing Area. Addendum 6 to the SEAD LUC RD added SEAD-46, SEAD 003-R-01 [SEAD-57]), SEAD 002-R-01, and SEAD 007-R-01 in accordance with the SEAD LUC RD Supplementation provision.

An Environmental Easement for the SEAD-002-R-01 property was recorded in the Seneca County Clerk's office on 10 June 2011. SEAD-002-R-01 was transferred to the SCIDA with a Quitclaim Deed executed on 27 May 2011. The property was transferred with the land use restrictions, consistent with the LUC Objectives as defined in the LUC RD. The deed incorporated by reference the land use restrictions set forth in the Environmental Easement. A summary of the ICs currently implemented at SEAD-002-R-01 is presented in **Table AF.2.1** based on the data and risk presented in the ROD and the LUC RD.

As the selected remedy does not allow unrestricted use and unlimited exposures, USACE or its successors are required to complete a review of the selected remedies at least once every 5 years, in accordance with Section 121(c) of the CERCLA. The selected LUC remedy is reviewed in accordance with this inspection frequency; the LUCs are inspected as part of the FYR and on an annual basis.

Table AF.2.1: Institutional Controls Summary Table

Media, engineered controls, and Area That Do Not Support UU/UE Based On Current Conditions	Were media of concern identified in the ROD?	Were ICs Implemented in the ROD?	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Land Use	Yes	Yes	SEAD 002-R-01	Prohibit residential housing, elementary and secondary schools, childcare facilities and playground activities.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant.
MEC	Yes	Yes	SEAD 002-R-01	Requires the Army (or Army contractor) to conduct an annual 3R Explosives Safety Education Program for property owners of the Seneca AD Munitions Response Sites.	Environmental Easement, Deed Restriction, CERCLA Section 120(h)(3) notice and covenant, zoning.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AF.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AF.3.2**).

Table AF.3.1 Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-002-R-01	Protective	The remedy implemented for SEAD-002-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AF.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-002-R-01	NA	Continue the implementation of LUCs and the annual frequency of periodic reviews;	Completed	LUCs were implemented as intended. Annual inspections were completed in 2021, 2022, 2023, 2024, 2025, 2026.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

Routine sampling was not deemed necessary by the ROD, therefore no data was collected or reviewed as part of the FYR process.

Site Inspection

SEAD-002-R-01 was inspected on 3 February 2026, to assess whether required LUCs imposed by the approved ROD are being maintained. FYR site visit photographic logs are contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

The following observations were made during the site inspection:

- No residential housing units, elementary or secondary schools, childcare facilities or playgrounds were observed at SEAD 002-R-01.

Interviews

Since SEAD 002-R-01 is uninhabited and unoccupied, no interviews were conducted during the FYR process.

Institutional Controls Verification

The LUCs, Environmental Easements, and deed restrictions are in place. The LUC performance objectives are listed in the remedial actions section of this appendix.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by completed ROD for SEAD-002-R-01 have been completed and documented. No continuing active remediation is required. Based on a review of LUC RD, Environmental Easements, transfer deeds and the FYR site visit conducted on 3 February 2026, all remedies are functioning as intended by the decision documents.

The remedy implemented at SEAD-002-R-01 is currently protective of human health and the environment because:

- An LUC that prevents the use of or the development of the property for residential housing, elementary or secondary schools, childcare facilities, or playgrounds has been implemented and is currently being maintained, monitored, and reported upon periodically.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-002-R-01. SEAD-002-R-01 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the exposure assumptions, exposure pathways, and RAOs used at the time of the remedy selection are still valid. The toxicity data used at the time of remedy selection have changed. However, no risk concerns were identified for any receptors evaluated for the site. No chemicals of concern were identified, and no cleanup levels were set forth. An LUC has been placed on the site that prohibits residential housing, elementary or secondary schools, childcare facilities, or playgrounds due to the potential presence of MEC. As a result, the RAOs and the remedy are considered valid and protective.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-002-R-01. There have been no changes in the physical condition of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-002-R-001, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

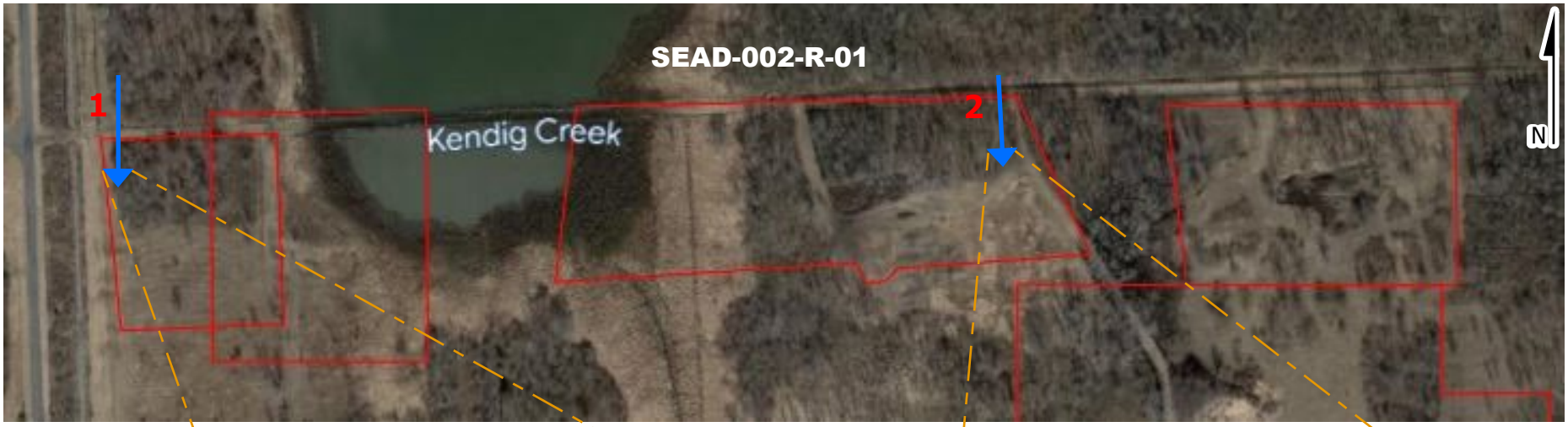
The remedy implemented for SEAD-002-R-01 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

223

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Attachment 1

Photographic Log

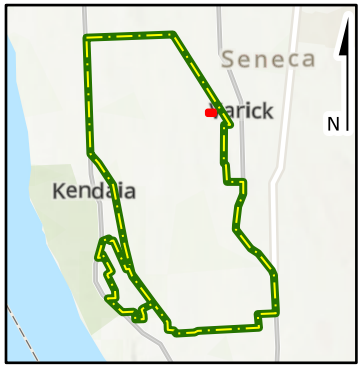




002-1



002-2



Legend

- Former Depot Boundary
- SEAD Site
- Photo Viewing Direction

SEAD-002-R-01
FYR/LUC Inspection - Photo Log
Former Seneca Army Depot
Romulus, New York
Map Date: 2/12/2026 8:33 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane
New York Central FIPS 3102 Ft US

\\SYRACUSEFP\Syracuse\GISdata\Federal\Seneca_Army_Depot\PROJECTS\ArcPro_(aprx)\637490374_USACE_Huntsville_SenecaArmyDepot_LUCInspections\637490374_USACE_Huntsville_SenecaArmyDepot_LUCInspections - Copy.aprx

Attachment 2

Site Inspection Checklist

SEAD FYR/LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD 002-R-01	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

No residential, schools, childcare facilities and playgrounds present. 3R training program in place.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Erosion Noted? ☐ Yes ☑ No ☐ NA

If yes, describe:

Adequate Signage? ☐ Yes ☑ No ☐ NA

If no, describe:

No signage

II. Interviews

Appendix AG

SEAD-23: Open Burning Grounds

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APPENDIX AG: SEAD-23 OPEN BURNING GROUNDS

AREA SPECIFIC BACKGROUND INFORMATION

History of Contamination

The OB Grounds (SEAD-23) site occupies approximately 30 acres on gently sloping terrain in the northwest corner of SEAD. The OB Grounds is bounded on the east by Reeder Creek, which is a perennial creek that is generally less than 1 foot deep and eventually flows into Seneca Lake. The quality of surface water in Reeder Creek has been designated by the State of New York as a Class C waterbody. Seneca Lake is located approximately 10,000 feet west of the site and is used as a source of drinking water for SEAD and surrounding communities.

The land at the OB Grounds had been used for demilitarization of munitions for approximately 40 years. The open burning procedure involved the preparation of combustible beds of pallets and wooden boxes on the pads followed by the placement of ammunition or the components to be demilitarized on the beds. A trail of propellant was placed on the ground leading to the combustible bed. Once ignited the energetic material was allowed to burn until only ash and casing residues remained. Items burned included various military munitions such as propellants and projectiles.

The burning of munitions had been performed at designated burning pads, which ranged in size from approximately 100 by 100 feet to 300 by 800 feet. Designated munitions waste was open-burned on the nine separate burning pads until 1987. After 1987, munitions were destroyed by burning them within an aboveground steel tray to minimize the impact of the burning on the environment.

Initial Response

The open burning of waste munitions was identified as a RCRA regulated process. Due to the nature of SEAD's former mission, it was necessary for the facility to treat, store, and dispose of hazardous wastes including waste munitions. Consequently, a RCRA permit was a regulatory requirement for SEAD to perform these operations as a TSDF.

SEAD applied for a RCRA Part A and Part B permit on 1 May 1987 and operated the facility under the interim status provisions of RCRA. Interim status allows a facility to operate as a TSD facility during the RCRA Part B permit application process.

Final closure of the OB Grounds under RCRA guidelines was deferred when SEAD was nominated for inclusion of the NPL in July 1989; SEAD was listed on the NPL in Group 14 on the Federal Section. Following SEAD's NPL listing, USACE, EPA, and NYSDEC agreed that any corrective actions required for any targeted problem sites would be regulated under CERCLA guidelines. RCRA requirements are an ARAR pursuant to Section 121 of CERCLA.

Basis for Taking Action

Because site conditions may pose an elevated ecological risk due to the presence of heavy metals, especially copper and lead in soil and sediment, an action was required at SEAD-23 to ensure land use remains protective of ecological receptors.

Contaminants of Concern

The primary media investigated at the OB Grounds included soil, surface water and sediment (from Reeder Creek, on-site areas and drainage swales), and groundwater. The primary COCs identified included metals, PAHs, explosive compounds, and phthalates. These components were likely released to the environment during the historical open burning activities.

During the 1999 remedial investigation, the burn pads at the OB Grounds were sampled for explosives including: HMX; RDX; 1,3,5-trinitrobenzene; 1,3-dinitrobenzene; tetryl; 2,4,6-trinitrotoluene; 4-amino-2,6-dinitrotoluene; 2- amino-4,6-dinitrotoluene; 2,6-dinitrotoluene; and 2,4-dinitrotoluene. None of the detections of explosives within soil were above the current EPA Industrial SCO (no state standards exist for these compounds).

Human Health and Ecological Risk Assessment

The risk assessment concluded that at SEAD-23, the human health cancer risks were within the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6} and the he calculated non-cancer HI were less than 1.0 for all receptors. Table 7-3 in the ROD (USACE 1999c) summarizes the results for total carcinogenic risks and non-carcinogenic hazard.

The ecological risk assessment for the OB Grounds began by evaluating the COCs found at the site in conjunction with the site-specific biological species/habitat information. Soils and sediment, in particular on-site soils and sediment in the low-lying wet areas suggest that site conditions may pose an elevated ecological risk due to the presence of heavy metals, especially copper and lead. This risk is increased in the low-lying areas where sediment from runoff accumulates. Sediments in Reeder Creek may also pose an elevated ecological risk due to the presence of heavy metals, such as copper and lead.

REMEDIAL ACTIONS

Remedy Selection

The ROD titled *Final ROD Former Open Burning (OB) Grounds Site* (USACE 1999c) outlines the elements that composed the remedy:

- Although OE is not expected to be found at depth at this site, through a combination of geophysics, excavation, sifting, removal and soil cover, the Army will nevertheless remediate OE to meet the DoD DDESB requirements for unrestricted use or put into place land use restrictions as may be required by the DDESB.

- Excavation of soils with lead concentrations above 500 mg/kg and sediments from Reeder Creek with concentrations of copper and lead above the NYSDEC criteria of the 16 mg/kg and 31 mg/kg, respectively.

- Treatment of soils exceeding the TCLP, estimated to be approximately 3,800 cy of the excavated soil, via solidification/stabilization will be performed to remove the RCRA characteristic of toxicity. This will allow the soil to be landfilled, in accordance with the requirements of the Land Disposal Restriction of RCRA.

- Disposal of the excavated and solidified soil in an off-site Subtitle D landfill. The total quantity of soil to be disposed of was estimated to be 17,900 cy, including the 3,800 cy of solidified soil.

- Construction of a soil cover of at least 9 inches of compacted soils in the areas of the OB Grounds with soils remaining on the site with lead concentrations above 60 ppm. The area to be covered is estimated to be approximately 27.5 acres, which encompasses most of the area of the OB Grounds. The cap will be vegetated with indigenous grasses to prevent erosion and to prevent direct contact and incidental soil ingestion by terrestrial wildlife. The monitoring program will ensure that the 9-inch soil/vegetative cover is maintained after the remedy is complete.

- Control of surface water runoff, as necessary, to prevent erosion of the vegetative cover and solids loading to the creek. This will be accomplished with vegetation, regrading of site topography and drainage swales.

- Conducting a monitoring program for site groundwater and sediment in Reeder Creek. This program will monitor metals. For groundwater, the level of detection will be to below 15 µg/L, the federal action level for lead in groundwater. For sediment, the detection limit for lead will be to 10 mg/kg. Should a significant exceedance be noted, the exceedance will be confirmed through additional sampling and, if confirmed, appropriate corrective measures will be implemented to eliminate the threat posed by the exceedance. For groundwater, this action may include metals removal via filtering. A similar process will apply for a sediment exceedance observed in Reeder Creek. First, the source of the exceedance will be identified and confirmed. If the exceedance is determined to originate from the OB Grounds site, then maintenance of or improvements to the existing erosion control systems will be instituted to reduce the threat due to erosion of on-site soils to the Creek. This may include revegetation or the construction of drainage control swales or structures.

- Periodic monitoring of groundwater quality at the OB Grounds for lead and copper content.

- Periodic monitoring of the vegetated, compacted soil cover placed over the lead contaminated soil remaining at the OB Grounds to assess whether evidence of erosion or protective cover breaching were present, which could result in the potential migration of contaminated soil.

- Periodic monitoring of the sediment in Reeder Creek for lead and copper content.

Remedy Implementation

The OB Grounds Soil and Sediment Remediation Completion Report documents the remediation at the OB Grounds in accordance with the Revised Draft Work Plan dated April 1999, Parsons' Section C – Technical Specifications dated August 1998, and the ROD (USACE 1999c). The primary activities completed to achieve the remediation objectives for the site included excavation and disposal of soils with concentrations of lead greater than 500 mg/kg, removal of sediment from Reeder Creek in areas adjacent to the OB Grounds, application of 9 inches of clean soil cover to areas where lead concentrations exceed 60 mg/kg, and establishment of a vegetative cover to prevent soil erosion.

Remediation activities at the site were conducted between June 1999 and May 2004. Work was conducted over this 5-year period in several different mobilizations and included the following tasks:

- Mobilization and site preparation, including surveying and excavation area layout.
- Decommissioning of 33 groundwater monitoring wells and one ground boring where a monitoring well (MW-28) had reportedly been installed but was not found at the time of the fieldwork.
- Excavation of approximately 88,000 cubic yards of Case I soil (>800 mg/kg total lead), Case II soil (500 to 800 mg/kg total lead), and Case III soil (<500 mg/kg total lead).
- Diversion of Reeder Creek and excavation of approximately 2,300 cy of creek sediments.
- Post-excavation confirmation sampling and characterization sampling.
- Stabilization of soils and sediments to meet TCLP hazardous waste disposal criteria.
- Off-site disposal of approximately 7,000 tons of untreated soil and 50,400 tons of treated (stabilized) soils and sediment as non-hazardous material at a licensed disposal facility.
- Off-site disposal of approximately 283,300 gallons of wastewater generated from site activities.
- Site restoration including: backfilling, grading, and seeding the site.

Following a review of the confirmatory soil sample results, it was concluded that the horizontal and vertical extents of lead in soil at the burn pad locations has been sufficiently delineated and removed from the OB Grounds to below 60 mg/kg (20.6 mg/kg average). In addition, all adjacent surface soils (within the 1-foot cut and site perimeter) have been reduced to below 500 mg/kg

(89.6 mg/kg average). Combined, the burn pad, 1-foot cut, and site perimeter total lead average is 55.1 mg/kg (based on 274 samples).

SEAD-23 (OB Grounds) Soil Removal Cleanup Goals		
Analyte	Cleanup Goal (mg/Kg)	Goal Met?
Lead	60*	Yes

*The value of 60 mg/kg was based on soil lead levels considered to be protective of ecological receptors presented by the U.S. Fish and Wildlife Service in the publication, Evaluating Soil Contamination, Biological Report 90, (2), July 1990.

A total of approximately 2,300 cy of sediment from Reeder Creek was removed and disposed of off-site, 32 monitoring wells were decommissioned, approximately 50,426 tons of soil were stabilized onsite prior to off-site disposal, and approximately 57,424 tons of soil was disposed of as RCRA Subtitle D Non-Hazardous soil at an approved facility.

A total of 25 grids encompassing an area of approximately 7 acres were backfilled to a depth of 9 inches using excavated soils containing less than 60 mg/kg total lead. All accessible areas of the OB Grounds were fine- graded and seeded.

The OB Grounds LTM program includes a qualitative assessment (i.e., visual inspection) of Reeder Creek for evidence of migration of material via surface water flow or groundwater transport of contaminants into the remediated section of Reeder Creek adjacent to and down gradient of the OB Grounds. The visual inspection consists of walking the creek bed (or embankment) to look for evidence of soil erosion or sloughing from the Creek embankment adjacent to the OB Grounds and/or the accumulation of sediment along the stream bed. Additionally, monitoring of the vegetated compacted soil cover placed over the contaminated soils at SEAD-23 are monitored via drone to assure the long-term integrity of the soil cover. Presently, groundwater sampling of the OB Grounds monitoring wells and quantitative monitoring of sediment quality (i.e., submitting samples for copper and lead analysis as identified in the approved remedy for the site in the ROD) are not included as parts of the LTM activities; USACE, EPA, and NYSDEC agreed that groundwater sampling is no longer necessary and until data indicated that either groundwater transport of contaminants or soil transport from the OB Grounds was occurring, sampling and analysis of Creek sediments would not be required.

While the OB Ground ROD required an LTM program, no LUCs have been established for this site.

System Operations/Operation and Maintenance

Not applicable; no active remedy.

PROGRESS SINCE LAST FIVE-YEAR REVIEW

This section includes the protectiveness determinations and statements from the last FYR (**Table AG.3.1**) as well as the recommendations from the last FYR and the current status of those recommendations (**Table AG.3.2**).

Table AG.3.1: Protectiveness Determination/Statements from the 2021 FYR

Site	Protectiveness Determination	Protectiveness Statement
SEAD-23	Protective	The remedy implemented for SEAD-23 is protective of the environment and protects human health. The remedy continues to minimize explosive safety hazards. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants, and none are expected to occur during the next 5 years.

Table AG.3.2 Status of Recommendations from the 2021 FYR

Site	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SEAD-23		With mutual agreement of all parties, no further LTM monitoring of the groundwater will occur at the OB Grounds. Soil cover inspections will continue and be performed as part of annual LUC inspections.	Completed	The inspection of Reeder Creek and the soil cover occur on an annual basis. The review of the results and conclusions of the LTM program is included in the site inspection section of this appendix.	NA

FIVE-YEAR REVIEW PROCESS

Document Review

See Section 11 – References in the main FYR report for a summary of the documents, data, and information which were reviewed in completing this FYR.

Data Review

LTM is an integral component of the approved remedy implemented at the OB Grounds. The ROD, Former Open Burning Grounds Site (USACE 1999c) indicated that monitoring of groundwater and the vegetated soil cover at the OB Grounds, and of the sediment within Reeder Creek was required. In accordance with the approved remedy as presented in the ROD, the current LTM activities at the site per the LTM Plan for the OB Grounds (USACE 2007d) include the following three components:

- The annual collection and analysis of groundwater samples for lead and copper concentrations.

- The inspection of the vegetated, compacted soil cover that has been constructed over interred lead- contaminated soil as part of the site remedial actions in order to assess if

erosion or breaching of the protective cover has occurred, which could result in the potential migration of contaminated soil.

- The inspection of Reeder Creek where the Creek abuts the OB Grounds to evaluate the potential for inward migration and deposition of soil from the OB Grounds.

After 15 years of LTM groundwater monitoring, no evidence of COCs migrating into the groundwater was observed and therefore the groundwater monitoring portion of the LTM was terminated (USACE 2021b). Monitoring of the vegetated compacted soil cover placed over the buried soils at the OB Grounds and the inspection of Reeder Creek to evaluate inward migration of soil continues annually at the site.

Based on the most recent inspection of SEAD-23 in 2025, USACE has made the following conclusions:

- The integrity of the vegetated compacted soil cover at SEAD-23 was intact, covered with dense vegetation and there was no evidence of any significant erosion.

- Visual inspection of Reeder Creek confirmed no erosion or accumulated sediment along the embankment adjacent to SEAD-23.

- Field observations noted that the mechanisms previously placed at SEAD-23 to prevent transported soil material from entering the spillways were working as intended.

- The next inspection of the SEAD-23 soil cover and Reeder Creek is planned for spring/summer of 2026. The 2026 inspection will include a drone flight to inspect the soil cap areas.

Site Inspection

Inspections of both SEAD-23 soil cap and Reeder Creek were performed on 22 July 2025. Based on this inspection, there were no visible signs that SEAD-23 site soils are being released via overland flow to Reeder Creek. Soil cap areas that are not accessible from the roadways were inspected by reviewing high-definition drone imagery that was collected during a drone flight. While there were some areas with thin vegetation coverage, no erosion was present, assuring the integrity of the soil cap. The majority of the soil cap is covered in dense vegetative cover. The visual inspection of Reeder Creek did not indicate the migration of contaminated soils had occurred. No evidence of erosion or accumulated sediment was present along the embankment adjacent SEAD-23. The embankment is well vegetated aiding in the prevention of a sidewall collapse. Examinations of spillways connecting SEAD-23 to Reeder Creek show no indication of soil or debris being transported from SEAD-23. While comparing SEAD-23 soil cap and Reeder Creek inspection photographs to previous years inspections, the current conditions at the site appear consistent. The high-definition drone imagery collected during the site inspection was used in place of the FYR-site visit photo log and is contained in **Attachment 1** and completed FYR site inspection checklists are contained in **Attachment 2**.

Interviews

Since SEAD-23 is uninhabited and unoccupied, no interviews were conducted during the FYR process for SEAD-23.

Institutional Controls Verification

Not applicable.

TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes. Remedial actions required by the ROD for the OB Grounds have been completed and documented (USACE 2005c). No continuing active remediation is required in OB Grounds. Based on a review of the remediation completion report, LTM reports, the remedy is functioning as intended by the decision documents.

The remedy implemented at SEAD-23 is currently protective of human health and the environment because:

- Residual lead and copper concentrations remaining in the soils have not impacted groundwater at, or in the immediate vicinity of the site above the applicable action levels.
- Groundwater sampling for copper and lead concentrations have not been detected above their RL enough times to perform a meaningful statistical analysis of the historical data thus indicating little to no migration of these COCs into the groundwater.
- The integrity of the vegetated soil cover overlying interred contaminated soils at the OB Grounds Site was intact and there was no evidence that terrestrial wildlife are exposed or will be exposed to the lead-contaminated soils interred below the 9-inch soil cover.
- USACE will continue to monitor soil cover erosion and will note any instance of cover erosion or exposed native or interred soil.
- Based on evaluation of the groundwater data and the results of the cover inspection, there is no evidence to suggest that the OB Grounds may be contributing to the degradation of sediment quality in Reeder Creek.
- Field observations noted that the mechanisms previously placed at the OB Grounds to prevent transported soil material from entering the spillways were working as intended.
- USACE will continue to inspect Reeder Creek for evidence of sediment deposition and if it is observed, a sediment sampling and analysis program plan will be prepared, submitted for approval, and implemented for Reeder Creek at locations adjacent to the OB Grounds.

The selected remedy is still protective of human health and the environment. No early indicators of potential issues have been identified for SEAD-23. SEAD-23 is currently monitored and reported annually. No significant changes in site conditions have been noted over the last three FYRs; therefore, optimization may be appropriate. Recommendations for optimization will be provided under separate cover following the acceptance of this FYR.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The exposure assumptions and RAOs used at the time of the remedy are still valid. There have been changes to toxicity data since the time of the remedy. The changes described in this section are not expected to alter the protectiveness of the remedy for SEAD-23.

For SEAD-23, copper and lead were identified as COCs. For lead in soil, a cleanup level of 500 mg/kg, based upon human health, was identified for removal actions. This lead cleanup level was considered protective for recreational land use. Additionally, surface soils with lead above 60 mg/kg were covered with at least 9 inches of clean fill (USACE 1999c). On 16 October 2025, the EPA updated guidance for evaluating residential lead exposures at CERCLA and RCRA Sites (EPA 2025). While SEAD-23 is not a residential site, the EPA revised lead guidance lowered the target blood-lead level from 10 µg/dL to 5 µg/dL when evaluating lead in soil. The soil lead cleanup level is lower than the EPA industrial soil RSL (800 mg/kg), NYSDEC Restricted Use Commercial (1,000 mg/kg), and NYSDEC Restricted Use Industrial (3,900 mg/kg). However, remedial actions at SEAD-23 resulted in average soil lead concentrations of 20.6 mg/kg within the OB Grounds and all adjacent surface soils average soil lead concentration of 89.6 mg/kg. This reveals that the remedial actions have resulted in soil lead concentrations to are protective of human health.

For sediment within Reeder Creek, cleanup levels for lead were 31 mg/kg and for copper were 16 mg/kg. The cleanup levels for lead and copper are protective of human health. For ecological receptors, these values represented lowest effect level and are protective of ecological receptors. Therefore, changes to toxicity data do not change the protectiveness of the cleanup levels or the remedy.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information of significance that would affect the protectiveness of the remedy.

According to the data reviewed and the site inspection, the remedy is functioning as intended by the ROD for SEAD-23. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. ARARs cited in the RODs remain protective of human health and the environment.

As a result of the Historical Record Review in February 2022, PFAS was identified as a potential contaminant of concern at SEAD-23, and the site was recommended for inclusion in the PFAS SI. The results of the PFAS SI are not final at the time of this review.

ISSUES, RECOMMENDATIONS AND FOLLOW-UP ACTIONS

No issues were identified for this FYR. USACE has the following recommendations:

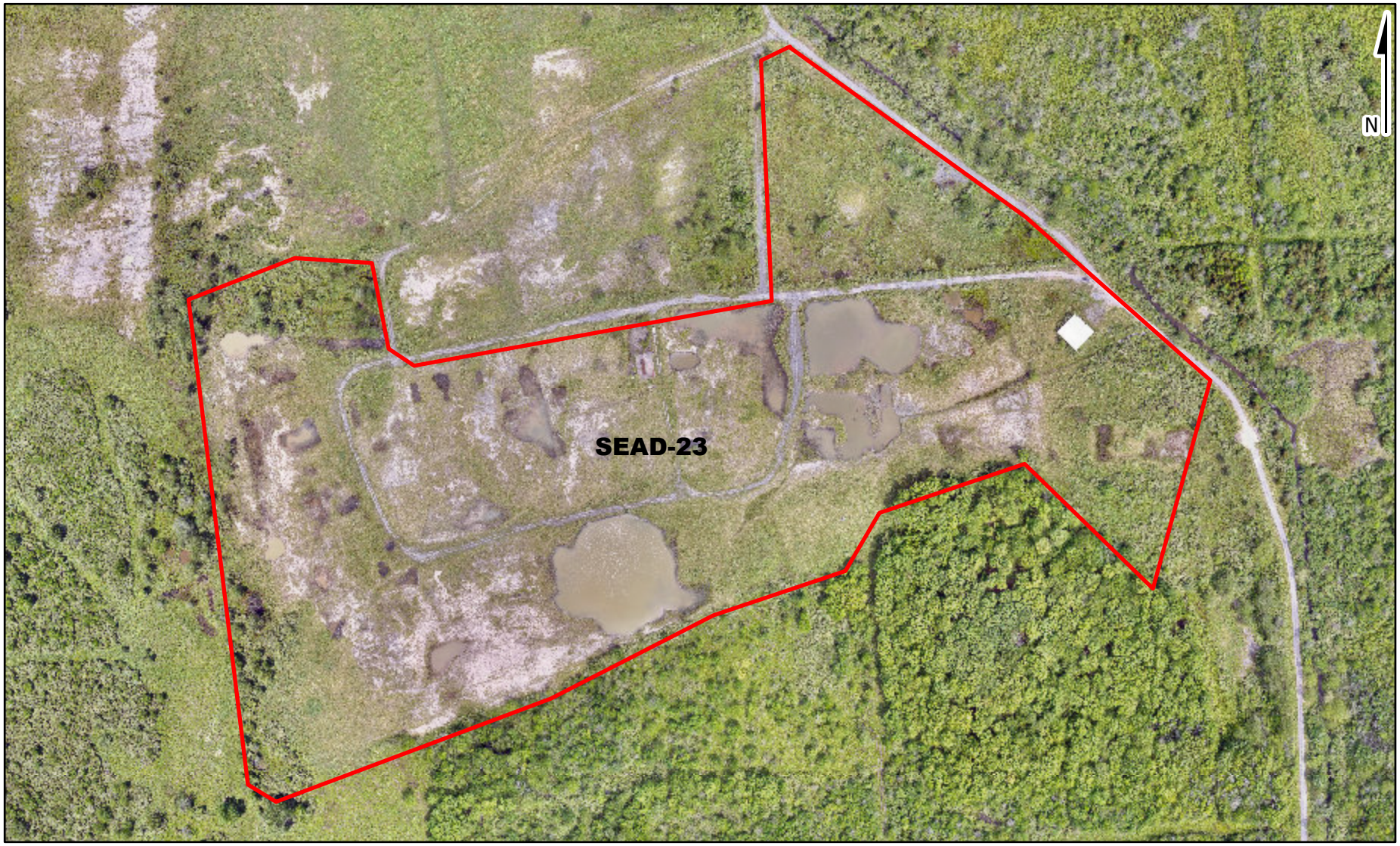
- Continue the implementation of LUCs.
- Review optimization opportunities and provide recommendations under separate cover following the acceptance of this FYR.

PROTECTIVENESS STATEMENT

The remedy implemented for SEAD-23 is protective of the environment and protects human health. Currently, there are no unacceptable exposures to human or environmental receptors from source area contaminants and none are expected to occur during the next 5 years.

Attachment 1

Photographic Log





Legend

- Former Depot Boundary
- SEAD Site

SEAD 23
2026 LUC/FYR Inspection - Photo Log
Former Seneca Army Depot Romulus, New York

Map Date:3/3/2026 8:07 AM

Source: Google Earth 2020
Projection: NAD 1983 (2011) StatePlane New York Central FIPS 3102 Ft US

Attachment 2

Site Inspection Checklist

SEAD LUC Inspections
Site Inspection Checklist

I. Site Information

Site Name:	SEAD-23	**Date of Inspection:**	02-03-2026
Location and Region:	Conservation and Recreation	**EPA ID:**	NY0213820830
Institution Leading the Five-Year Review:	EA	**Weather:**	Mostly Cloudy 25F
Inspector:	L Casey	**Signature**	

Remedy Includes:

Landfill Cover/Containment	☐ Yes	☑ No	☐ NA
Access Controls	☐ Yes	☑ No	☐ NA
Institutional Controls	☑ Yes	☐ No	☐ NA
Groundwater Pump and Treatment	☐ Yes	☑ No	☐ NA
Surface Water Collection and Treatment	☐ Yes	☑ No	☐ NA
Monitored Natural Attenuation	☐ Yes	☑ No	☐ NA
Groundwater Containment	☐ Yes	☑ No	☐ NA
Vertical Barrier Walls	☐ Yes	☑ No	☐ NA
Other	☐ Yes	☑ No	☐ NA

Other Comments

Attachments: ☐ Inspection Team Roster ☐ Site Map

Comments

Burn pad soil cover areas are in good condition. Vegetative cover review from high definition drone data.

Observations:

Current Land Use

Vacant land

Intrusive Activities Noted?	☐ Yes	☑ No	☐ NA
Erosion Noted?	☐ Yes	☑ No	☐ NA
Adequate Signage?	☐ Yes	☑ No	☐ NA

If yes, describe:

If yes, describe:

If no, describe:

No signage

II. Interviews