SENECA ARMY DEPOT
ROMULUS, NY

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Announcements and Key Topics

PFAS - Current Status:

On March 14, 2023, EPA announced the proposed National Primary Drinking Water Regulation (NPDWR) for six PFAS including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA, commonly known as GenX Chemicals), perfluorohexane sulfonic acid (PFHxS), and perfluorobutane sulfonic acid (PFBS). EPA anticipates finalizing the regulation by the end of 2024 after the public comment process has been completed. The proposed Maximum Contaminant Level (MCL) for PFOS and PFOA is 1.40 parts per trillion (also expressed as ng/L) each. See https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas

In 2020, the New York State Department of Health (NYSDOH) set maximum contaminant levels (MCLs) of 10 parts per trillion (10 ppt) each for PFOA and PFOS in drinking water. In March 2023, the New York State Department of Environmental Conservation (NYSDEC) issued final water quality guidance values to regulate PFOA and PFOS in New York State waters.

Ongoing PFAS Investigations at the former Seneca Army Depot

Investigation of the emerging contaminants known as per and polyfluoroalkyl substances (PFAS) is ongoing at the former depot. The initial investigations focused on areas where the Army had used and/or stored Aqueous Film Forming Foam (AFFF), historically used by the Department of Defense (DOD) for fire fighting and fire fighting training exercises.

The Army began fieldwork for a PFAS Remedial Investigation (RI) at 5 sites in April 2023, and completed the fieldwork in October 2023. AFFF was used and/or stored by the Army at these 5 sites. The RI included sampling and analysis of soil, groundwater, surface water, and sediment at SEAD-25 (Fire Training and
Demonstration Pad), SEAD-26 (Fire Training Pit and Area), the Firehouse (Building 103), SEAD-122D (Hot Pad Spill) and SEAD-122E (Plane Deicing Pads), The latter 2 sites are located at the airfield. EPA expects the Army to submit the draft RI Report to the regulatory agencies during the Winter of 2024.

Prior to conducting the RI fieldwork, the Army had submitted a draft RI Work Plan and Quality Assurance Project Plan (QAPP) to the regulatory agencies in November 2022. EPA and NYSDEC reviewed the draft Work Plan and submitted comments to the Army. EPA ultimately approved the final Work Plan in August 2023.

The Army is also currently conducting a PFAS Site Investigation (SI) at 34 sites at the Former Depot. The 34 sites were selected for the SI during a Preliminary Assessment (PA) conducted by the Army in 2022 to evaluate additional potential AFFF as well as potential non-AFFF PFAS release areas. Fieldwork began on April 3, 2023, and was completed in October 2023. Soil, groundwater, surface water and sediment were sampled and analyzed for PFAS. EPA expects the Army to submit the draft SI Report to the regulatory agencies during the Winter of 2024.

EPA reviewed and approved the draft PA Report in June 2022. The Army eventually submitted a draft SI Work Plan to the regulatory agencies on April 19, 2023. EPA commented on the draft Work Plan. The Army revised the Work Plan in response to EPA and NYSDEC comments and submitted the draft final version to the regulatory agencies on August 24, 2023.

Potential Off-Depot PFAS Impacts

Off-depot Groundwater Well Sampling

Sampling of 22 off-depot drinking water wells for PFAS was conducted by NYSDOH in 2018. None of the wells had PFAS above EPA’s Health Advisory Level (HAL) at the time of 70 parts per trillion (ppt).

Because the full nature and extent of PFAS contamination at the former depot has not yet been defined, EPA has formally requested that the Army conduct a survey of all private drinking water wells located within one mile of the former depot boundary as soon as possible. The Army is reportedly coordinating with NYSDOH and NYSDEC on a well survey. It is EPA’s understanding that there are no private wells located within the boundary of the former depot, as drinking water was historically provided by a municipal water supply located off-depot. EPA has also requested that the Army sample off-depot groundwater wells that are identified during the well survey for PFAS once permission of the well owners is granted.

Potential PFAS Impacts to Seneca Lake, Reeder Creek, and Kendaia Creek

EPA has formally requested that the Army sample surface water and sediment at Reeder and Kendaia Creeks for PFAS where they enter / originate on the former depot, and where they exit the depot at its boundary in order to determine whether Army activities at the former depot may have impacted the 2 creeks and if the creeks are potential pathways of PFAS to Seneca Lake. Thus far the Army has not agreed with our request.

NYSDEC Fish Sampling at Kendaia Creek
NYSDEC submitted fish sampling data to EPA and the Army in October 2023. The data was from fish collected by NYSDEC in 2019 in Kendaia Creek off-depot near where the creek enters Seneca Lake. PFAS levels in the fish were elevated.

**Future Land Use and Potential PFAS Contamination:**

To the west, and downgradient, of SEADs-25 and 26 is a section of the former depot that has been designated for future farming use. In 2018, NYSDEC sent a letter to the Seneca County Industrial Development Agency (IDA) advising them of the potential risk of any future groundwater use within the farming area. Additionally, in February 2019, EPA, NYSDEC, and NYSDOH held a conference call with the Army, the IDA, the owner of 7,000 acres of former depot property and other stakeholders, during which the regulatory agencies made all of these stakeholders aware of the potential for PFAS contamination in groundwater, and of the ongoing and planned PFAS studies.

**Open Detonation (OD) Grounds**

A Proposed Remedial Action Plan (PRAP) for remediation of the OD Grounds site has been developed by the Army and has been reviewed and commented on by EPA and NYSDEC. The 3rd version of the PRAP is currently under review by EPA and NYSDEC. It is anticipated that the Plan will be released for public comment by June 2024. The Plan recommends excavation of the OD Hill to grade with mechanical separation of UXO/DMM from that excavated soil, surface/subsurface munitions clearance over the entire site, excavation or capping of soils contaminated with munitions constituents, and Land Use Controls (LUCs).

**Public Participation Opportunities**

**Open Detonation (OD) Grounds**

A Proposed Plan for remediation of the OD Grounds developed by the Army has been reviewed and commented on twice by EPA and NYSDEC, and is currently under revision by the Army. It is hoped that the Plan will be released for public comment by June 2024. The Plan recommends excavation of the OD Hill to grade with mechanical separation of UXO/DMM from that excavated soil, surface/subsurface munitions clearance over the entire site, excavation or capping of soils contaminated with munitions constituents, and Land Use Controls (LUCs).

Public comment will be solicited by the Army when the Proposed Plan for the OD Grounds is released. A Proposed Plan may also be issued for PFAS, in which case public comment would also be solicited.