



SENECA ARMY DEPOT ROMULUS, NY

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Announcements and Key Topics

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 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). The PRAP was finalized and released for public comment on September 27, 2024. The public comment period is from September 30, 2024 through November 1, 2024. The public is invited to attend an in-person meeting on October 9, 2024 from 1:00 - 7:00pm at the Seneca Army Depot Activity, Building 125, 5786 State Rt. 96, Romulus, New York 14541 to explain this Proposed Plan and the alternatives presented in the Feasibility Study Report. Verbal and written comments will be accepted at the meeting.

The Proposed Plan is available for public comment at the following link: <https://www.nan.usace.army.mil/Missions/Environmental/Environmental-Remediation/BRAC/Seneca-Army-Depot/>

PFAS - Current Status:

On April 10, 2024, EPA announced the final 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 established legally enforceable levels, called Maximum Contaminant Levels (MCLs), for six PFAS in drinking water: PFOA, PFOS, PFHxS, PFNA, and HFPO-DA as contaminants with individual MCLs, and PFAS mixtures containing at least two or more of PFHxS, PFNA, HFPO-DA, and PFBS using a Hazard Index MCL to

account for the combined and co-occurring levels of these PFAS in drinking water. EPA also finalized health-based, non-enforceable Maximum Contaminant Level Goals (MCLGs) for these PFAS. ESee <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas> for more information.

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 NYSDOH 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.

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 NYSDOH 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.

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.

Public Participation Opportunities

Open Detonation (OD) Grounds

A Proposed Plan for remediation of the OD Grounds was released for public comment on September 27, 2024. Comments should be provided before November 1, 2024. The public is invited to attend an in-person meeting about the planned remedial action alternatives for the OD Grounds site on October 9, 2024. The meeting will be held at the Seneca Army Depot Activity, Building 125, 5786 State Rt. 96, Romulus, New York 14541 from 1:00 - 7:00 PM. Verbal and written comments will be accepted at the meeting.

The Proposed Plan is available for public comment at the following link: <https://www.nan.usace.army.mil/Missions/Environmental/Environmental-Remediation/BRAC/Seneca-Army-Depot/>

For more information and details of the public meeting schedule, please see the Administrative Record at: <https://senecaarmydepotar.com>

OCTOBER 24, 2024