Meeting Minutes Restoration Advisory Board Former Schenectady Army Depot – Voorheesville Area May 6, 2003 Guilderland Public Library Guilderland, New York

Restoration Advisory Board Members and Project Staff Attendees:

Ted Ausfeld

Joan Burns

Peter Buttner

Joan Kappel

Charles Rielly, Acting Community Co-Chair

Kenneth Rivers

Earl Tanis

Marion Tanis

Charlotte Bethoney, New York State Department of Health

Joe Crua, New York State Department of Health

Lori Davidson, DNSC

Gregory J. Goepfert, U.S. Army Corps of Engineers, Army Co-Chair

Ken Kosinski, New York State Department of Environmental Conservation

George Momberger, New York State Department of Health

George Moreau, Parsons Engineering Science, Inc.

Kevin Reilly, DNSC

Dennis Wesolowski, Defense Logistics Agency

Deb Volkmer, Weston

Other Attendees

Nicole Barr, Altamont *Enterprise*Natalia Buttner, Resident
Brett Frazier, U.S. Army Corps of Engineers, Huntsville District
Drew Graham, Shaw Environmental
Ann Miller, Albany *Times Union*Chris Rivers, Resident

Introductions and Presentation of Appreciation

G. Goepfert called the meeting to order at 6:35 p.m. and asked everyone to stand and recite the Pledge of Allegiance. After the pledge all Restoration Advisory Board (RAB) members, project staff, and other attendees introduced themselves. G. Goepfert presented a framed certificate of appreciation to Peter Buttner:

U.S. Army Corps of Engineers, New York District Commander's Certificate of Appreciation is awarded to: Peter J.R. Buttner, Ph.D.

in recognition of:

your dedicated service as Co-Chairman of the Restoration Advisory Board for the former Schenectady Army Depot – Voorheesville Area of Albany County, New York. Your leadership greatly facilitated the remediation efforts at this Formerly Used Defense Site. These contributions are hereby acknowledged by the U.S. Army Corps of Engineers on behalf of the people of the United States of America.

Dated: 6 May 2003 Signed by: John B. O'Dowd COL, EN

Commanding

G. Goepfert also presented Mr. Buttner with gold coin of the U.S. Army Corps of Engineers (USACE) – New York District.

Selection of Acting Community Co-Chair

Charles Rielly and Ted Ausfeld were elected Acting Community Co-Chairman and Alternate Acting Community Co-Chairman, respectively.

Status of Current and Planned Remediation and Investigation Work

- G. Goepfert gave a PowerPoint presentation that summarized the Fiscal Year 2003 Plan status. (Attachment 1 provides G. Goepfert's PowerPoint presentation.) G. Goepfert said the cleanup of the burn pit was the highest priority action. He added that the USACE would prepare a Data Gap Work Plan to finish up the remedial investigation; however, funding is not yet available.
- G. Goepfert said the next time the RAB will meet is when a report is prepared, like the Data Gap Work Plan. He added that he will maintain contact with the Acting Community Co-Chairman and Alternate Acting Community Co-Chairman on a more frequent basis to keep the members informed of progress of FSADVA remediation activities.
- T. Ausfeld said that RAB members would like to go out on the site with the USACE. He asked if there would be any new investigations.
- G. Goepfert responded that the Corps would do new investigations if the funding was available.

- G. Goepfert said the Corps would mobilize on May 12, 2003, to begin excavation on the Area of Concern #3. He added that an office trailer is already on the site.
- C. Rielly said he was concerned that the present-day standards will change in the future. He said that acceptable lead standards have constantly been lowered. He said that the RAB letter-to-the-editor in the Altamont *Enterprise* newspaper stated that the members work with the New York State Department of Environmental Conservation and the New York State Department of Health; that there is not enough investigation; and that there is not enough funding.
- G. Goepfert said the Guilderland High School Cleanup Report is in the two information repositories and another copy has been available to the RAB members.
- T. Ausfeld said some areas that were worked on need to be seeded near the creek, school, and warehouse areas. He added that any open area near the creek needed to be seeded as soon as possible.
- G. Goepfert agreed and said that seeding is included in the work plan. He added that one area was left open for a new foundation. He said that seeding would take place in the appropriate areas once digging is completed.

Discussion of Outstanding Actions

The meetings discussion focused on questions posed by local RAB members in an e-mail from C. Rielly to G. Goepfert regarding documents G. Goepfert had provided to RAB.

- 1. p.1 Has anything been done regarding the heavy concentration of lead in the DLA ponds which periodically overflow and spill into the Black Creek (per comments of G. Moreau and J. McCullough)?
- K. Reilly said the contract is being awarded and that he hopes it will start this summer. He added that he did not believe that there is a large concentration of lead in the pond. He said the ponds would be built to 25-year flood specifications. He said the ponds are working for concentrations of all chemicals and that the ponds should discharge only clean water. He said there is no lead on site, but zinc. He added that the ponds will be finished this summer and the state will issue a State Pollutant Discharge Elimination (SPDES) permit.
 - T. Ausfeld asked if testing would be once or twice a year.
 - K. Reilly responded that the State would determine that.
- T. Ausfeld said that he recommends that all the metals be tested at least once a year during the dry part of the year.

- K. Reilly said the facility is not an industrial site. He added that the Defense National Supply Center (DNSC) may be considering a study to assess whether a stabilizer could be used to prevent the leaching of lead.
 - C. Rielly said the lead stockpile left a footprint and it remained.
- K. Reilly said yes, to keep it in place to prevent it from leaching. The area will be mounded and covered with clean fill.
 - C. Rielly asked if lead is in one place and shallow, why not remove it?
- K. Reilly responded that the volume of contaminated soil would be phenomenal to remove the lead. He added that the retention pond would collect the lead particles because the lead would lie on the bottom of the pond and not move anywhere.
- T. Ausfeld asked about operations manual and/or engineering report on the retention ponds.
- K. Reilly said reports would be made available to RAB. He added that eventually the property would be turned over to the General Services Administration. One option would be to have deed restrictions for industrial/commercial uses only.
- C. Rielly said RAB is concerned about something going into the creek and affecting the drinking water.
- K. Reilly said that heavy rains make the creek run very high. He said he talked to Albany County but the county had no interest in the matter. He added that lead is a natural metal in soil. He said if the lead were removed, where would they take it for disposal? He said disposal areas are expensive and the disposal area would also have to be covered. He asked if removal and disposal is solving a problem or moving a problem. He added that with more asphalt covering the site there would be more rainwater runoff. He said 11 million gallons run through there a year.
- C. Rielly said with the lead settling at the bottom of the pond what would trigger the cleanup of the pond.
- K. Reilly said it is important to test the water and make sure the water is clean. He added that it was important to keep this perspective in mind.
- E. Tanis said with the sediment collecting over time, who would be responsible for that in the long term?
- K. Reilly said if it were in the permit, it would be passed along to the new owner. He said if the town became the owner the town would be responsible. He added that the water is directed to the creek, the water is clean, and the residents do not drink sediment. He said it is important that the water is kept under control on the other side of Depot Road.

- K. Kosinski said that area is under the County's jurisdiction.
- 2. p. 2 Regarding the contamination at the burn pit, is it 10 feet below the surface as D. Geraghty claims or shallower as T. Ausfeld believes?
- G. Goepfert said contamination would be noted during the digging activities. He said that tests now show contamination down to the water table.
 - T. Ausfeld asked where the contamination would go.
- G. Goepfert said the excavated contaminated materials would be sent to a licensed disposal facility.
- K. Rivers said more testing at the Burns' property is needed because he believes there is more contamination in that area.
- 3. p.4 As regards Black Creek classification and SPDES permits, who is the local official J. McCullough contacted? Will he/she be at our next RAB meeting? If so, could he/she comment on SPDES permits and the status of the stored plastics?
 - K. Kosinski said there is a procedure for that.
- T. Ausfeld said the Lortex company had a SPDES permit for discharging BEHP amounts in Black Creek.
 - K. Kosinski said Lortex was no longer in operation.
 - T. Ausfeld said levels of BEHP have been located downstream.
 - K. Reilly said levels of BEHP have also been located upstream.
 - T. Ausfeld said the BEHP could be buried and leaching.
 - J. Crua said BEHP is a common plasticizer.
 - K. Kosinski said he would review the historical data for any discharge of note.
 - T. Ausfeld asked both DEC and DOH to respond.
 - G. Momberger said they do not know right now and that is the reason for the data gap.

- 4. Regarding the question about how a contaminant could be present during one sampling event, then disappear during the next:
- C. Bethoney said that samples were collected from an irrigation well one sample identified BEHP and other sample did not identify BEHP. She added that the sample that did identify BEHP could be due to turbidity and the well would be sampled again. She said the well was taken off-line in the fall of 2002 to hook up a combined irrigation system.
- G. Momberger said if the subsequent sampling does not show BEHP, then the first sample would be considered an anomaly.
- 5. p.8 Are weather patterns/conditions being noted prior to collection of new test samples per G. Goepfert?
- G. Goepfert said when the Corps does sampling they will note the weather patterns, conditions in the season, seasonal weather, and velocity of the creek. He added that the Corps would note the following:
 - Sample during lower flow periods to collect data
 - Velocity testing of the creek
 - Identify local area weather conditions via RAB members or local media
 - T. Ausfeld said it was important to note the weather conditions.
- 6. pp. 8-9, p. 13., p. 21 What are the current plans for sediment sampling in the Black Creek and the reservoir delta? Has J. McCullough checked on the availability of sampling data in the delta area?
- G. Goepfert said there was no response from DEC. He said the Corps would be sampling Black Creek, but the current plan does not include the reservoir delta.
 - C. Rielly said it is important to sample in the reservoir delta.
- G. Momberger said that could only be ubiquitous industrial contamination and could not be traced back to one source.
- T. Ausfeld and C. Rielly said Southern Landfill is an example of contamination moving off-site and into Black Creek.
- 7. p. 9 Was the NEIP C&D landfill on or not on a wetland (see conflicting statements by J. McCullough in minutes from 4/29/02 and 10/17/02)?
 - G. Momberger said it is not on the wetlands, according to Jeff McCullough.

- 8. p. 15, p. 20 If, according to D. Geraghty, BEHP evaporates quickly have more recent tests shown a steady reduction in BEHP levels? Has BEHP in any wells exceeded drinking water standards? If so, what action has been taken?
- G. Goepfert said Ron Groves of Albany County is not in attendance at the RAB meeting to address this questions. G. Goepfert said that yes, an analysis result for BEHP from a monitoring well at Area of Concern (AOC) 7 did exceed drinking water standards. He added that the Corps would identify additional sampling in the data gap work plan.
- C. Bethoney said that BEHP is not soluble in water but it clings to particles and degrades quickly.
- 9. p. 16 Regarding the Burns property, D. Geraghty said no contamination located has presented health concerns. Mrs. Burns said that a number of times over the years, workers dressed in contamination outfits removed materials from the site. What were these materials? If they did not present a health concern, why were such extra-ordinary precautions taken?
- K. Reilly said that workers personal protection clothing is standard operating procedure for personal safety in that line of work.
 - G. Goepfert asked what was the time span.
 - J. Kappel responded in the 1980s.
- T. Ausfeld and C. Rielly asked what was in the barrels that were removed and that couldn't more stuff still are buried there.
- J. Kappel said she read a report that was dated in the 1990s that identified what was removed that included chromium and paint sludge. [Two reports are referred to in the Archive Search Report, namely a Metcalf & Eddy report dated February 1988 (pg. 3-7ff) and an OHM report dated 21 June 1991 (pg. 3-18ff), where the discovery and removal of drums at AOC 2 are documented].
 - K. Rivers said there is still more contamination in the area.
 - G. Goepfert said the Corps would do more sampling on the Burns' property.
 - P. Buttner said that Mrs. Burns needed to be on the property when the sampling is done.
- G. Goepfert said the Corps would not go on Mrs. Burns' property without her presence and permission.
- G. Moreau said they would need to clear cut overgrown areas to find unknown buried materials, if geophysical or ground penetrating radar techniques are to be used.

- 10. p. 18 Have DEC Fish and Wildlife staff, particularly Ward Stone, been consulted regarding a study of fish and invertebrates living in the Southern Landfill retention pond which is a Superfund site?
- G. Goepfert said the FSADVA is not a Superfund site and that he did not know whom from Fish and Wildlife reviewed the study.
 - C. Rielly said the sampling needs to be bigger more than a visual.
 - G. Goepfert said that will be included in the Data Gap Work Plan.
- C. Rielly said it would be good to have someone from Fish and Wildlife in to discuss how a study of fish and invertebrates would be done.
 - J. Burns asked if the retention pond on her property had been sampled.
 - G. Moreau said yes the testing was done and it was determined that the water was clean.
 - C. Rielly said he would like more details from Fish and Wildlife.
 - G. Goepfert said he would discuss that with DEC and RAB.
 - T. Ausfeld asked if test pits would be done in the landfill near the pond.
- G. Moreau said he would research prior study (Malcom Pirnie 1997) to see if that had been done and what the results were. [FINDINGS: Malcolm Pirnie excavated 18 test pits to about 5 feet deep around the Southern Landfill to assess the lateral extent of the fill. Based on those test pits, the extent of the fill was defined by Malcolm Pirnie (see Figure 2-1 of the 1997 report, which should be available in the public repository)].

11. p. 19 – Have any changes occurred in the pollution plume emanating from the burn pits?

- G. Goepfert said there has not been any testing and, therefore, no data. He added that the Corps would conduct quarterly sampling for two years following remediation of the burn pit areas.
- T. Ausfeld asked about the other well on the far side of the [Southern] landfill, i.e., the Metweld well.
 - G. Moreau responded that sampling was conducted and there were "no detects."
- 12. p. 23 Regarding creosote, do PAH levels approach MCL's and what is the health hazard? Could J. McCullough explain how creosote saturates the first half-inch of the surface, but goes no further?

G. Momberger said creosote is not water soluble so it does not move very far. He said there are several sources of PAH, not just creosote.

13. p. 24 – What is DOH's response to the cumulative and combining effects of contaminants?

- C. Rielly said RAB is concerned about levels of contamination and combined chemicals approaching health hazard levels.
- C. Bethoney said she has not looked at that in detail. She said DOH does look at acute exposures.
- J. Crua said DOH also looks at additive effects and that risk assessment is a difficult science.
- G. Goepfert concluded by stating that many of the questions will be addressed in the Data Gap Work Plan. He said he has the data from Watervliet but cannot release it. He added that RAB members could directly request the information from Nick Ostapkovich of the Watervliet Water Authority.
- C. Rielly said RAB could get the answers if RAB met more often and that twice a year is not enough.
- G. Goepfert said he would maintain contact with the RAB's Acting Community Co-Chairman and Alternate Acting Community Co-Chairman on a monthly basis to address questions and provide updates. He added that RAB would have a formal meeting when a report is released.

Attachment 2 to these minutes includes responses to RAB questions.

Adjournment

The meeting was adjourned at 8:45 p.m.



Former Schenectady Army Depot Voorheesville Area

Restoration Advisory Board Meeting May 6, 2003



Agenda

- Introductions
- Selection of Acting Community Co-Chair
- New Project Participants
- Status of current/planned remediation and investigation work
- Discussion: Outstanding actions
- Adjournment

06 May 2003

Former Schenectady Army Depot

US Army Corps
of Engineers
New York District

Fiscal Year 2003 Plan Status

- Complete Burn Pit Cleanup
- Assemble Remedial Investigation Data Gap Workplan*
- Perform sampling & analysis*
- Complete draft Feasibility Study –
 Area of Concern #2

*pending availability of funds

06 May 2003



Former Schenectady Army Depot Voorheesville Area

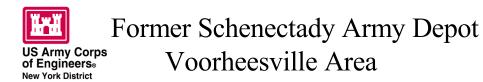
AOC 3: Burn Pit Excavation

• Mobilize to Site: May 12, 2003





• Begin Excavation: May 16, 2003



•Discussion : Outstanding Actions

06 May 2003

Responses to RAB Questions

4/29/02 - RAB Meeting

p.1- Has anything been done regarding the heavy concentration of lead in the DLA ponds which periodically overflow and spill into the Black Creek (per comments of G. Moreau and J McCullough)?

The current construction of the ponds was designed to reduce the offsite migration of sediment from the site. The ponds are planned to be enlarged to reduce the amount of surface water leaving the site. Upon closure of the DNSC operations, the sediment quality in the ponds will be assessed, along with the surface soils at the site.

p.7- According to D. Wesolowski, the additional ponds on the DLA site were to be in place by the end of the summer. Have they been constructed?

Not yet, but the plan is to construct them this year.

10/17/02 - RAB Meeting

p.1- Has a summary report on the bus garage site been prepared and distributed?

The final report was provided to Mr. Rielly, RAB Co-chairman at the May $6^{\rm th}$, 2003 meeting.

p.2- Regarding the contamination at the burn pit, is it 10 feet below the surface as D. Geraghty claims or shallower as T. Ausfeld believes?

The depth to impacted soils has been found at one excavation [named ED-3 in the work plan] from 1 foot below ground surface to the water table, which was 15 feet below the ground surface in mid-May 2003.

p.3- Have the DLA site activities proposed by D. Wesolowski occurred i.e. expand a pond, add a pond, trench and add public water?

The ponds will be constructed this year, per DLA.

p.4- As regards Black Creek classification and SPDES permits, who is the local official J. McCullough contacted? Will he/she be at our next RAB meeting? If so, could he/she comment on SPDEA permits and the status of the stored plastics?

Mr. Kosinski attended the May 6, 2003 RAB meeting, as requested.

p.5- Could D Geraghty comment on how a sample tested on 4/24/02 could contain a contaminant above MCL, but when re-tested on 6/13/02 no contaminant was present?

C. Bethoney said that the contaminant found above the Maximum Contaminant Level (MCL) was a tentatively identified compound (TIC) in the chromatographic scan. It is also a "guestimated" value since it is not a compound that is calibrated on in the usual scan. It is also usually bound to soil, doesn't dissolve much in water, therefore most likely is present in the 4/24 sample due to the high particulate content of the water. The 6/13 sample may not have contained as many particulates, therefore it did not appear in the TIC scan.

p.7- Has there been any progress in doing a health study of residents living near the army depot site?

There has not been a health study done.

p.8- Are weather patterns/conditions being noted prior to collection of new test samples per G. Goepfert?

As part of the RI data gap work plan, local weather conditions will be noted for the days leading up to surface water and ground water sampling events.

pp.8-9, p.13, p.21- What are the current plans for sediment sampling in the Black Creek and the reservoir delta? Has J. McCullough checked on the availability of sampling data in the delta area?

The Corps will be doing additional sediment sampling in the Black Creek; sampling of the reservoir delta is not in the current plan.

p.9- Was the NEIP C&D landfill on or not on a wetland (see conflicting statements by J. McCullough in minutes from 4/29/02 and 10/17/02)?

George Momberger, NYDEC, stated that it was not on a wetland, per Jeff McCullough.

p.12- Could G.Moreau elaborate on exposure pathways for the federal stockpiles on the DLA site, the current status of contaminated ponds and what the corps has done to address the soil left behind?

The primary exposure pathway is direct contact with the soils onsite. There is no potential for direct contact exposure by the public, because the site access is restricted. The ponds are planned to be expanded this year, and the soil excavated from the bottom of the existing ponds will be staged onsite for future disposition, along with any impacted soils, at the time the Defense National Supply Center (DNSC) closes the depot.

p.15, p.20- If, according to D. Geraghty, BEHP evaporates quickly have more recent tests shown a steady reduction in BEHP levels? Has BEHP in any wells exceeded drinking water standards? If so, what action has been taken?

BEHP levels have not been measured over time to allow concentration trends to be identified. Several ground water samples were above Class GA ground water standards, and those areas are planned to be investigated further during the data gap investigation.

p.16- Regarding the Burns property, D. Geraghty said no contamination located has presented health concerns. Mrs. Burns said that a number of times over the years, workers dressed in contamination outfits removed materials from the site. What were these materials? If they did not present a health concern, why were such extra-ordinary precautions taken?

The use of tyvek suits is standard practice in most environmental investigations; site worker attire is determined by each project team on a case-by-case basis.

p.18- Have DEC Fish and Wildlife staff, particularly Ward Stone, been consulted regarding a study of fish and invertebrates living in the Southern Landfill retention pond which is a superfund site?

NYSDEC Fish and wildlife staff have reviewed the Draft Final RI Report and requested additional sediment characterization in the pond and Black Creek. They did not identify the need to assess impacts to fish and invertebrates, based on the data they had reviewed. For the record, the Southern Landfill is not considered to be a "Superfund Site."

p.19- Have any changes occurred in the pollution plume emanating from the burn pit?

To determine this answer, the Corps of Engineers will do additional groundwater monitoring subsequent to the interim remedial action at the location where the former burn pits are located.

- p.23- Regarding creosote, do PAH levels approach MCL's and what is the health hazard? Could J. McCullough explain how creosote saturates the first half inch of the surface, but goes no farther?
- G. Moreau provided handouts on PAHs presented during the meeting PAHs have low solubility and tend to adhere to organic matter in the upper portion of the soil, therefore they typically don't migrate very far into the soil.

p.24- What is DOH's response to the cumulative and combining effects of contaminants?

Cumulative and combining effects have not been evaluated due to the difficulty of determining synergistic (1+1=2), antagonistic (1+1=0), or potentiation (1+1=9) effects of individual contaminants with others.

pp.24-25- Has the City of Watervliet supplied the raw water data and the 20-year water testing data as requested?

Yes. The RAB can obtain the data upon request from the City of Watervliet.

p.26- The responses to RAB concerns missed the mark and were inadequate.

Comment acknowledged.

p.28- There is a need for more frequent RAB meetings. Meeting semi-annually is insufficient to maintain the fluidity and continuity of the investigation.

G. Goepfert noted that he would keep in touch with RAB members monthly through the Community Co-Chair, and include the RAB in reviews of work plans and other documents.

ACOE Responses to both RAB Letters and to RAB Issues and Concerns

p.1- T. Ausfeld letter 11/16/01: 4. How can a contaminant disappear?

Concentrations may be near the limit of detection, or the analyte may not be uniformly dispersed (homogeneous) in the materials sampled and so is not detected in every sample. If it was a "tentatively identified compound (TIC)", its initial presence may have been estimated or incorrectly identified.

p.2- T. Ausfeld letter 12/10/01: 4. Have both deeper sediment sampling and locations been established in RI/Data Gap Workplan?

Sediment sampling locations and depths will be discussed with NYSDEC and the RAB when the data gap work plan is prepared.

p.4- RAB letter 7/23/02: I. AOC 8- What is the status of further monitoring and characterization of Black Creek sediments and water quality? In AOC 1, what is the status of additional sediment sampling in the pond and the targeting of contaminants that exceed criteria?

These issues are planned to be addressed in the data gap work plan. Funding for the work plan is pending.

p.5- RAB letter 7/23/02: VI. (4) What is the status of the RI/Data Gap Workplan as regards additional Black Creek sampling and future sampling?

These issues are planned to be addressed in the data gap work plan. Funding for the work plan is pending.

p.5- RAB letter 7/23/03: VI. (6) Has NYS DEC Fish and Wildlife, particularly Ward Stone, been consulted?

NYSDEC Fish and wildlife staff have reviewed the Draft Final RI Report and requested additional sediment characterization in the pond and Black Creek. They did not identify the need to assess impacts to fish and invertebrates, based on the data they had reviewed.

p.7- RAB letter 7/23/02: VI. (19) Has additional sediment sampling been done on the pond?

This issue is planned to be addressed in the data gap work plan. Funding for the work plan is pending.

p.7- RAB letter 7/23/02: VI. (27) Has the City of Watervliet provided the water testing data that was requested?

Yes. The RAB may request this data directly from the City of Watervliet.

DEC Letter of 2/19/02, Regarding the Revised Draft Final RI Report dated 5/01

p.1, p.5- (3.2.2.5.9, 3.2.7.5.9, 4.8.2) Has BEHP contamination been further investigated, especially in AOC 7, where it exceeded NYS standards?

This issue will be addressed in the data gap work plan. Funding for the work plan is pending.

p.1- (3.2.3.5.19) How does ACOE propose further evaluation of dioxin?

NYSDOH evaluated the dioxin data and did not recommend any further action.

Comments from DFWMR in above DEC letter

p.1- (AOC 1) Have additional and deeper sediment samples been taken?

This issue is planned to be addressed in the data gap work plan. Funding for the work plan is pending.

p.2- (AOC 2) Has there been any further characterization of dioxin contaminants?

NYSDOH evaluated the dioxin data and did not recommend any further action.

p.3- (4.2.2) Have both the lateral and horizontal extent of contamination been defined?

This issue is planned to be addressed in the data gap work plan. Funding for the work plan is pending.

p.3- (4.9.2) Has additional sampling and characterization of the western drainage ditch been done?

This issue is planned to be addressed in the data gap work plan. Funding for the work plan is pending.

DOH Letter of 2/15/02, Regarding the Revised Draft Final RI Report dated 5/01

pp.4-5 (Executive Summary) Have all eight items in the Executive Summary been accepted?

AOC 1: Yes, additional sampling will be conducted.

AOC 2: More testing will be conducted before a remedial action is proposed in the final feasibility study document.

AOC 3: Yes, an interim remedial action is underway.

AOC 5: DNSC to take necessary flow management measures.

AOC 6: We agree no further action is necessary.

AOC 7: We agree to do further sampling under the data gap work plan.

AOC 8: We agree to do further sampling under the data gap work plan.

AOC 9: We agree the existing well will be redeveloped and resampled.

pp.5-6 (Specific Comments-3.2.3.5.19-AOC 2, Surface Soil Results) Please elaborate on TEQ test results. Apparently the highest test samples exceeded the level at which the Center for Disease Control (CDC) would consider actions to limit human exposure. Have such actions been initiated?

NYSDOH evaluated the dioxin data and did not recommend any further action.

p.7- (General Comment) What is the current status of the BEHP contamination investigation?

Additional BEHP sampling/analysis work will be conducted as part of the data gap work plan.

Responses to NYSDEC and NYSDOH Comments on the Draft Final RI Report Comments from DEC dated 2/19/02

p.1- (3), p.2 (9) (3.2.2.5.9) What is the current status of the BEHP investigation?

This issue is will be addressed in the data gap work plan. Funding for the work plan is pending.

p.1- (4) (3.2.2.5.28) Please elaborate on this discussion.

The samples referred to in this subsection were only analyzed for volatile organic compounds (VOCs) to update the status of the VOC plume previously found to exist in this area. A more complete assessment of groundwater quality, including inorganic analyses and background sample results, may be found in the 1997 Malcolm Pirnie, Inc., "Final Limited Remedial Investigation Report Former Voorheesville Army Depot U.S. Army Southern Disposal Landfill Guilderland, New York" dated April 1997.

p. 1 - (5) (3.2.3.5.19) Please explain the recommendation for no further action regarding TEO's.

NYSDOH evaluated the dioxin data and did not recommend any further action.

p.1- (8) (3.2.5) How has this section been updated?

Statements will be added to note that DNSC is expanding the ponds to limit sediment and surface water offsite migration. The final Remedial Investigation Report has not been issued.

p.2- (11) (4.2.2), What is the status of additional sediment sampling in the pond in AOC 1?

This issue will be addressed in the data gap work plan. Funding for the work plan is pending.

p.2- (12) (4.3.2) Why was the recommendation changed from removal of contamination from Mrs. Burns property to conducting a Focused Feasibility Study that will evaluate removal and capping options?

Because the outcome of the study's recommendation cannot be presupposed; additional sampling and analysis at AOC 2 will be performed as funding becomes available. The analyses data will form the basis for the recommendation in the Feasibility Study, combined with previous analysis results.

DFWMR comments contained in above responses

p.3- (17) (AOC 1) See p.2- (11) above.

p.3- (18) (AOC 2) See p.1- (5) above.

p.3- (21) (4.2.2) See p.2- (11) above.

p.3- (22) (4.6.2) What measures have been taken to reduce off-site migration of sediment and soils at AOC 5?

The construction of retention ponds several years ago has reduced the offsite migration of sediment and surface water. Expansion of the ponds, and the addition of new ponds, will further decrease the offsite migration of surface water and sediment.

p.3- (23) (4.9.2) How has the RI Data Gap Work Plan addressed the issue of deeper sediment characterization in the Black Creek and the western ditch?

This issue is planned to be addressed in the data gap work plan. Funding for the work plan is pending.

Comments from DOH dated 2/15/02

p.3- (25) (AOC 2) See p.2- (12) above.

p.4- (30) (AOC 8) What is the status of further testing of Black Creek sediment and water quality in the RI Data Gap Work Plan?

This issue will be addressed in the data gap work plan. Funding for the work plan is pending.

p.4- (31) (AOC 9) Has further sampling of well MW-9 been done?

No, this issue will be addressed in the data gap work plan. Funding for the work plan is pending.

p.4-(34) (3.2.3.5.19) See p.1- (5) above.

p.4- (37) (4.3.1) See p.2- (12) above.