

11 July 2017  
ERM Reference No. 0097881

Mr. Kevin Willis  
Remedial Project Manager – Fulton Avenue Superfund Site  
New York Remediation Branch  
United States Environmental Protection Agency, Region II  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Second Quarter 2017 Progress Report  
150 Fulton Avenue NPL Site - Operable Unit I  
USEPA Consent Judgment No. CV-09-3917  
DOJ Ref. No. 90-11-2-09329  
Garden City Park Industrial Site NYSDEC#130073

Dear Mr. Willis:

On behalf of Genesco Inc., this letter transmits the Second Quarter 2017 (April - June) Progress Report for the Fulton Avenue Superfund Site (Site).

**OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION**

During the reporting period, remedial design (RD) and remedial action (RA) activities continued as specified in the U.S. Environmental Protection Agency's (EPA) 30 September 2015 Amendment to the interim remedial action selected in the EPA's 28 September 2007 Operable Unit One (OU1) Record of Decision (ROD) for the Site.

**OU1 Remedial Design Work Plan**

As noted in the prior Progress Reports, an amended OU1 RD Work Plan was prepared and submitted to EPA on 14 October 2016 in accordance with the requirements of the revised August 2016 OU1 Consent Judgment (CJ) and revised OU1 Statement of Work (SOW) approved by the Court on 15 August 2016.

The amended OU1 RD Work Plan sets forth the objectives, performance standards, scopes of work, required deliverables and schedules for the OU1 RD activities, and subsequent implementation of the OU1 RA.

EPA provided initial verbal feedback on the 2016 OU1 RD Work Plan indicating that no groundwater sampling or well installation tasks should be performed until a revised version of the previously EPA-approved Quality Assurance Project Plan (QAPP)<sup>1</sup> and additional groundwater monitoring well design details were submitted to EPA for review and approval.

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<sup>1</sup> The October 2016 OU1 RD Work Plan originally anticipated revision and submittal of the QAPP as part of the overall Site Management Plan package for the Site after installation of the new groundwater monitoring wells.

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**QAPP:** A revised and conformed QAPP for the Site was submitted to EPA on 5 January 2017 for review and approval. On 20 March, EPA issued written comments regarding the revised QAPP. The document was revised and resubmitted to EPA on 11 May 2017. On 1 June 2017, EPA issued an additional set of written comments on the May 2017 QAPP. The document was further revised and submitted for final approval on 20 June. On 27 June 2017, EPA provided notification that the May 2017 Revised QAPP was approved.

**Groundwater Monitoring Well Design:** A Supplemental Groundwater Monitoring Well Specification Package was submitted to EPA on 13 January 2017 and subsequently approved on 25 January 2017 authorizing the well installation activities discussed further below (Remedial Construction Activities).

**Amended OU1 RD Work Plan:** On 20 June 2017, EPA provided minor written comments on the amended OU1 RD Work Plan. The document is being revised accordingly and will be resubmitted to EPA with the approved QAPP, an updated Health and Safety Plan (HASP), and updated OU1 RD and OU1 RA schedules.

### Remedial Construction Activities

As noted in the last progress report, deep multi-level groundwater monitoring well MW28A-H was drilled, installed and completed on the Garden City Country Club (GCCC) golf course with installation of a well vault and protective manhole on 31 March. The Waterloo multi-level well system installation was subsequently installed within the well, tested, and is fully functional for long-term groundwater monitoring.

Another smaller well (MW21D) is required to be installed to supplement the existing well cluster (MW21 A-C) on Wickham Road just north of Stewart Avenue located approximately 1,200 feet directly upgradient of Village of Garden City (VGC) water supply wells 13 and 14. Unfortunately, subdivision of a lot and construction of a new residential home on Wickham Road have rendered the original proposed location of MW21D no longer a viable work site to safely conduct the drilling and well installation activities. A suitable nearby alternate location has been identified that can accommodate the work space area requirements which is located just inside the northern GCCC property line along Stewart Avenue. A formal request for access to install the well at that location was sent to the GCCC management on 28 June 2017, copies of which provided to EPA. The request is being reviewed by GCCC management and we are presently awaiting a reply and/or approval to proceed.

With the exception of the new wells discussed above, all other existing wells designated in the 2016 SOW to facilitate long-term OU1 groundwater monitoring are greater than 10 years old, and periodic inspections are necessary to ensure continued integrity and function for long-term groundwater level/quality monitoring. Accordingly, all wells were inspected during June and an EPA Region 2 Superfund Well Assessment Checklist was completed for each well. The results thereof are being evaluated to develop a scope of work for maintenance (well top repairs and/or redevelopment) by the drilling subcontractor.

### UPCOMING 3<sup>RD</sup> QUARTER 2017 ACTIVITIES

The revised Amended OU1 RD Work Plan will be resubmitted to EPA on or before 14 July 2017 with attachments that include the approved QAPP, an updated Health and Safety Plan (HASP), and updated OU1 RD and RA schedules.

The revised OU1 RD schedule anticipates that EPA will subsequently approve the OU1 RD Work Plan by the end of July 2017. In addition to continuation of the Field Construction Activities, EPA's approval of the OU1 RD Work Plan will trigger commencement of the other 2016 SOW RD tasks that will continue throughout 2017 as reflected in the RD schedule. These activities include and further are summarized below:

- Field Construction Activities
- Groundwater Monitoring
- Key OU1 RA Plans
- Evaluation Reports

#### Field Construction Activities: Groundwater Monitoring Well Installations & Maintenance

As mentioned above, the long-term groundwater monitoring well network inspection results are being evaluated to develop a scope of work for maintenance (well top repairs and/or redevelopment) by the drilling subcontractor. The Well Assessment Checklist sheets for each well and a work scope summary matrix will be submitted under separate cover to EPA. It is anticipated that the well maintenance activities will be performed, as necessary, during early August 2017 in advance of the upcoming groundwater sampling activities.

One additional deep groundwater monitoring well (MW21D) will be installed in close proximity to the existing MW21A-C well cluster. It is anticipated that the GCCC management will reply favorably to the 28 June 2017 access request letter. EPA will be promptly informed of any reply/approval to proceed from the GCCC management and the anticipated drilling schedule under separate cover.

#### Groundwater Monitoring

In accordance with Attachment 1 of the 2016 SOW (Monitoring Well Sampling Program), the first sampling round for Group 1, consisting of 18 individual wells will commence within 20 days of EPA approval of the Amended OU1 RD Work Plan. Long-term groundwater monitoring will continue in accordance with additional groups/schedules established therein. These activities will include sample collection, laboratory analysis, data validation, data evaluation/reporting, and disposal of the investigative derived waste (monitoring well purge water).

#### Key OU1 RA Plans & Evaluation Reports

As indicated in the RD Schedule, preparation of the following RA plans and reports shall commence:

- **Site Management Plan (SMP)** with appended key supporting plans for long-term operations, maintenance, monitoring & reporting (OM&M) for the Site.

- **Green Remediation Plan (GRP)** that considers and specifies how the OUI RA can be implemented using the principles in EPA Region 2's Clean and Green Policy.
- **VGC Public Supply Well Nos. 13 & 14 Air Stripper Treatment Systems Evaluation/Report** to confirm that the existing air stripper treatment systems for VGC water supply wells 13 and 14 are protective of human health or determine if replacing components of, or repairing or upgrading the existing treatment systems for VGC water supply wells 13 and 14 is necessary to ensure the protectiveness of human health.
- **Vapor Phase Evaluation Report** to evaluate whether vapor-phase carbon is needed to capture and treat volatile organic compounds (VOCs) discharged from the air stripper treatment units on VGC water supply wells 13 and 14 in order to comply with NYSDEC's Air Toxics Program (6 NYCRR Part 212) and the Guidelines for the Control of Toxic Ambient Air Contaminants (DAR-1).

### 150 Fulton Avenue Sub-Slab Depressurization System

On 20 June 2017, EPA forwarded the results of sub-slab soil vapor/indoor air samples collected from beneath and within the building at 150 Fulton Avenue in February 2017. EPA indicated in the accompanying letter to Gordon Atlantic Corporation (the owner of the property) that the wind-driven sub-slab system should be upgraded by the addition of a continuously operating, electrically-powered fan. Following discussion with the EPA, the Genesco voluntarily agreed to install a fan. EPA requested submission of a brief work plan for review and approval before installation of the fan.

A site inspection is being coordinated with Gordon Atlantic to obtain the information necessary to prepare the work plan. Once the site visit is scheduled, EPA will be informed when the work plan will be submitted for review and approval.

If you should you have any questions or wish to discuss the content of this progress report, please do not hesitate to call me at (631) 756-8920.

Sincerely,



Chris W. Wenzel  
*Principal Consultant*

cc: Douglas Fischer, USEPA  
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