

10 October 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, 20th Floor
New York, NY 10007-1866

Re: Third 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

**Environmental
Resources
Management**

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Dear Mr. Willis:

On behalf of Genesco Inc., this letter transmits the Third Quarter 2017 (July - September) 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.

Amended 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.

On 14 July 2017, a final draft of the amended OU1 RD Work Plan was submitted to EPA for review and approval. The document was revised to address EPA comments communicated in their 20 June 2017 letter. The document included additional key appendices including:

- Appendix B: Supplemental Groundwater Monitoring Well Specifications – previously approved By EPA on 25 January 2017;
- Appendix C: Quality Assurance Project Plan – previously approved by EPA on 27 June 2017;
- Appendix D: Health and Safety Contingency Plan; and
- Appendix E: NCDOH Approvals For The Air Stripping Units For Village of Garden City (VGC) Well Nos 13-14.

On 3 August 2017, EPA issued a letter conditionally approving the amended OU1 RD Work Plan. Minor revisions were affected in accordance with the letter including updated schedules for the OU1 RD/RA activities, and a final document was submitted to EPA on 16 August 2017.

Key OU1 Plans & Evaluation Reports

As indicated in the RD Schedule, preparation of the following plans and reports commenced and/or were completed:

- **VGC Public Supply Well Nos. 13 & 14 Air Stripper Treatment Systems Evaluation/Report:** The evaluation was completed, and a summary report was prepared and submitted to EPA on 15 September 2017.
- **Vapor Phase Evaluation Report:** The evaluation was completed and a summary report was prepared and submitted to EPA on 15 September 2017.
- **Site Management Plan (SMP)** with appended key supporting plans for long-term operations, maintenance, monitoring & reporting (OM&M) for the Site is being prepared and will be submitted to EPA on or before 1 December 2017.
- **Green Remediation Plan (GRP)** that considers and specifies how the OU1 RA can be implemented using the principles in EPA Region 2's Clean and Green Policy is being prepared and will be submitted to EPA on or before 1 December 2017.

Remedial Construction Activities

As noted in the 2nd Quarter 2017 progress report, deep multi-level groundwater monitoring well MW28A-H was drilled, installed and completed on the Garden City Country Club (GCCC) golf course during the 2nd Quarter 2017.

During September 2017, conventional well MW21D was 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 VGC water supply well Nos. 13 and 14. The deepest well in the quadruplet cluster, the screen for MW21D was set at 448'-458' below ground surface. Well development and demobilization activities concluded on 6 October 2017. An initial groundwater sample will be collected from this well before the end of the October.

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 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.

Groundwater Monitoring

EPA's approval of the amended OU1 RD Work Plan and completion of construction of wells MW21D and MW28A-H triggered commencement of the long-term groundwater monitoring program in accordance with Attachment 1 of the 2016 SOW

(Monitoring Well Sampling Program). The first sampling event was completed during September 2017, and included sampling all wells in Groups 1-3 with the exception of new well MW21D discussed above. Long-term groundwater monitoring will continue in accordance with additional groups/schedules established in the 2016 SOW. These activities will include sample collection, laboratory analysis, data validation, data evaluation/reporting, and disposal of the investigative derived waste (IDW), i.e., monitoring well purge water.

150 Fulton Avenue Sub-Slab Depressurization System

On 22 September 2017, the Sub Slab Depressurization System Modification Work Plan was submitted to EPA for review and approval. The work plan was voluntarily prepared at EPA's request to upgrade the existing sub slab depressurization system (SSDS) currently operating at the 150 Fulton Avenue property by the addition of a continuously operating, electrically-powered fan.

UPCOMING 4th QUARTER 2017 ACTIVITIES

Key OUI Plans & Evaluation Reports

As indicated in the RD Schedule, preparation of the following plans will be completed and submitted to EPA on or before 1 December 2017:

- **Site Management Plan (SMP)** with appended key supporting plans for long-term 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.

Field Construction Activities: Groundwater Monitoring Well 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 late October - early November 2017 in advance of the next groundwater sampling event.

Groundwater Monitoring

The validation of the September 2017 groundwater sample laboratory data deliverables will be completed and results thereof will be submitted to EPA in a data transmittal under separate cover.

In accordance with the 2016 SOW, the next long-term groundwater sampling event will consist of sampling the Groups 2 & 3 wells in December 2017. These activities will include sample collection, laboratory analysis, data validation, data evaluation/reporting, and disposal of the IDW (monitoring well purge water).

Investigative Derived Waste

The IDW generated from the September groundwater sampling event (monitoring well purge water) and the installation of groundwater monitoring well MW21D (drilling mud, cuttings & development water) is being temporarily stored in the staging area at the 150 Fulton Avenue property. The wastes will be managed, characterized and properly disposed of at permitted facilities in accordance with all Federal, state and local regulations.

150 Fulton Avenue Sub-Slab Depressurization System

It is anticipated that EPA will review and approve the 22 September 2017 Sub Slab Depressurization System Modification Work Plan. The upgrade the existing SSDS (the addition of a continuously operating, electrically-powered fan) would be scheduled based on contractor availability and implemented shortly thereafter.

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

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