

15 January 2020
ERM Reference No. 0097881

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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: Fourth Quarter 2019 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. (Settling Defendant), this letter transmits the Fourth Quarter 2019 (October – December) Progress Report for the Fulton Avenue Superfund Site (Site).

OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION

During the reporting period, remedial action (RA) activities continued as specified in the U.S. Environmental Protection Agency's (EPA) 30 September 2015 Amended Operable Unit One (OU1) Record of Decision (ROD) for the Site. The OU1 Remedial Design (RD) and RA activities (the Work) are being implemented in accordance with the 2016 OU1 Consent Judgment (2016 CJ) and 2016 OU1 Statement of Work (2016 SOW) approved by the Court on 15 August 2016, and the EPA-approved 2017 OU1 RD Work Plan.

During 2016-2018, remedial design (RD) activities were completed and concluded with EPA's approval of the OU1 RD Report on 25 March 2019. Remaining OU1 RA activities for which the Settling Defendant is responsible are:

- Long-term groundwater monitoring and reporting (Table 1 & Figure 1);
- Maintenance of the associated groundwater monitoring wells and the sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property; and
- Submittal of an OU1 RA Report (triggered by EPA's approval of the OU1 RD Report).

The Incorporated Village of Garden City (VGC) operates public supply wells 13 & 14 and the associated air stripper treatment systems, which are not under the Settling Defendant's control.

Long-Term Groundwater Monitoring

The long-term groundwater monitoring program commenced in September 2017 following EPA approval of the OU1 RD Work Plan, and is currently being implemented on a semi-annual frequency in accordance with the:

- 2016 CJ;
- Schedule provided in Attachment 1 of the 2016 SOW: Monitoring Well Sampling Program (see attached Table 1);
- EPA-approved 2017 Quality Assurance Project Plan (QAPP) for the Site; and
- OU1 RA Schedule (Figure 3 of the OU1 SMP) which is now at semi-annual frequency.

Long-term groundwater monitoring well network locations are shown on the map presented as Figure 1.

The results of the August 2019 groundwater sampling event completed during 12-23 August 2019 were presented in the Third Quarter 2019 Progress Report (July – September). This was the seventh groundwater sampling event that included collection and analysis of forty-six (46) groundwater samples (plus quality assurance/quality control (QA/QC) samples) from the following monitoring wells:

- Group 1 (18 wells): Wells GCP-01S/D, GCP-08, GCP-18S/D, GCP-15S, MW15A-B, MW20A-C, MW22A-C & MW23A-D;
- Group 2 (4 wells): Wells MWs 21A-D; and
- Group 3 (3 multi-level well systems/24 well zones): Wells MWs 26A-H, 27A-H, 28A-H.

Groundwater Monitoring Well Inspections

During 9-13 September 2019, the protective roadway boxes/concrete pads were replaced at groundwater monitoring well cluster locations MWs 20A-C, 21A-D, 22A-C & 23A-D (14 wells). These wells (except MW-21D) were installed in 2003-2004 so the existing well protective roadway boxes/concrete pads were 15+ years old and deteriorating. The work activities were coordinated with the VGC. A photo log showing the completed well repairs is presented in Attachment 1.

Remedial Action Report

The draft OU1 RA Report was prepared in general conformance with applicable portions of the 2016 SOW and was submitted to EPA on 26 November 2019. The document presents key summaries specified in the 2016 SOW such as:

- Introduction, Site Background & Investigative/Remedial/Administrative History;
- OU1 Remedial Design & Interim Remedial Actions Completed;
- Continued OU1 RA & Other Activities;
- Chronology of Major OU1 RD/RA Events; and
- Summary of Project Costs, Contact information & Updated RA Schedule.

VGC Water Supply Well Monitoring

The VGC continued operations and maintenance (O&M), monitoring and protection (treatment) of VGC water supply wells 13 and 14. In early January 2020, the VGC provided new sampling results and pumpage records for VGC water supply wells 9, 13 and 14 (October through December 2019). The pumpage records indicate that nearby Well No. 9 was not operated much nor sampled between the summer of 2017 and December of 2019.

The new data were incorporated into the existing database set, and used to update corresponding charts for the Well Nos. 13 & 14 showing PCE and TCE concentrations versus time, and historic monthly pumpage versus time to evaluate recent contaminant concentration trends depicted in the same. The updated charts for Well Nos. 13 & 14 are presented as Figures 2 & 3, respectively.

Figure 4 presents average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) for each of the three wells by year (2001 – 2019), and plots of average annual PCE and TCE concentrations versus time for each of the three wells for comparative viewing. The data and resultant plots indicate that since 2007, concentrations of PCE have fluctuated over time since 2007, but both maximum observed and annual average concentrations of PCE have been declining in Well Nos. 13 & 14. Concentrations of TCE have been declining in Well No. 13, and are beginning to decline in Well No. 14. A brief summary that puts the relative concentrations in perspective is presented in the table below.

VGC Well	Dominant Compound Historic High	2007 Average (µg/L)	2019 Average (µg/L)	Difference of Averages	% Change of Averages
No. 13 (N-07058) 6/4/2007					
PCE	1,020	722.6	404.1	-317.9	-44%
TCE	91.5	90.0	49.9	-40.1	-45%
No. 14 (N-08339) 10/27/2007					
PCE	769	370.1	357.5	-12.6	-4%
TCE	69	38.9	34.5	-12.4	-11%

UPCOMING FIRST QUARTER 2020 ACTIVITIES

Groundwater Monitoring

Long-term groundwater monitoring will continue in accordance with groups/schedules established in the 2016 SOW (Table 1) and indicated in the OU1 RA Schedule (Figure 3 of the Site Management Plan). Accordingly, long-term groundwater monitoring has transitioned to the semi-annual schedule specified for Year 3 in Table 1. The next semi-annual event is scheduled for the week of 24 February 2020 (weather permitting) that will consist of sampling the Groups 2 (MWs 21A-D) and Group 3 wells (MWs 26A-H, 27A-H, 28A-H and 21A-D).

Investigative Derived Waste (IDW) Management & Disposal

The IDW generated from the groundwater sampling event (monitoring well purge water) was temporarily stored in the secure staging area at the 150 Fulton Avenue property. Innovative Waste Recycling Technologies coordinated disposal of the purge water as a F002 hazardous waste at a properly permitted facility (Republic Environmental Systems in Hatsfield, PA) in accordance with all Federal, state and local regulations. The IDW was transported to the disposal facility on 14 January 2020.

VGC Water Supply Well Monitoring

A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 through March 2020 will be obtained, and the updated charts and tables will be presented in the First Quarter 2020 Progress Report in April 2020.

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

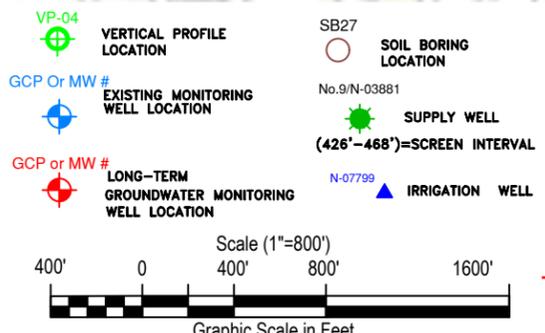
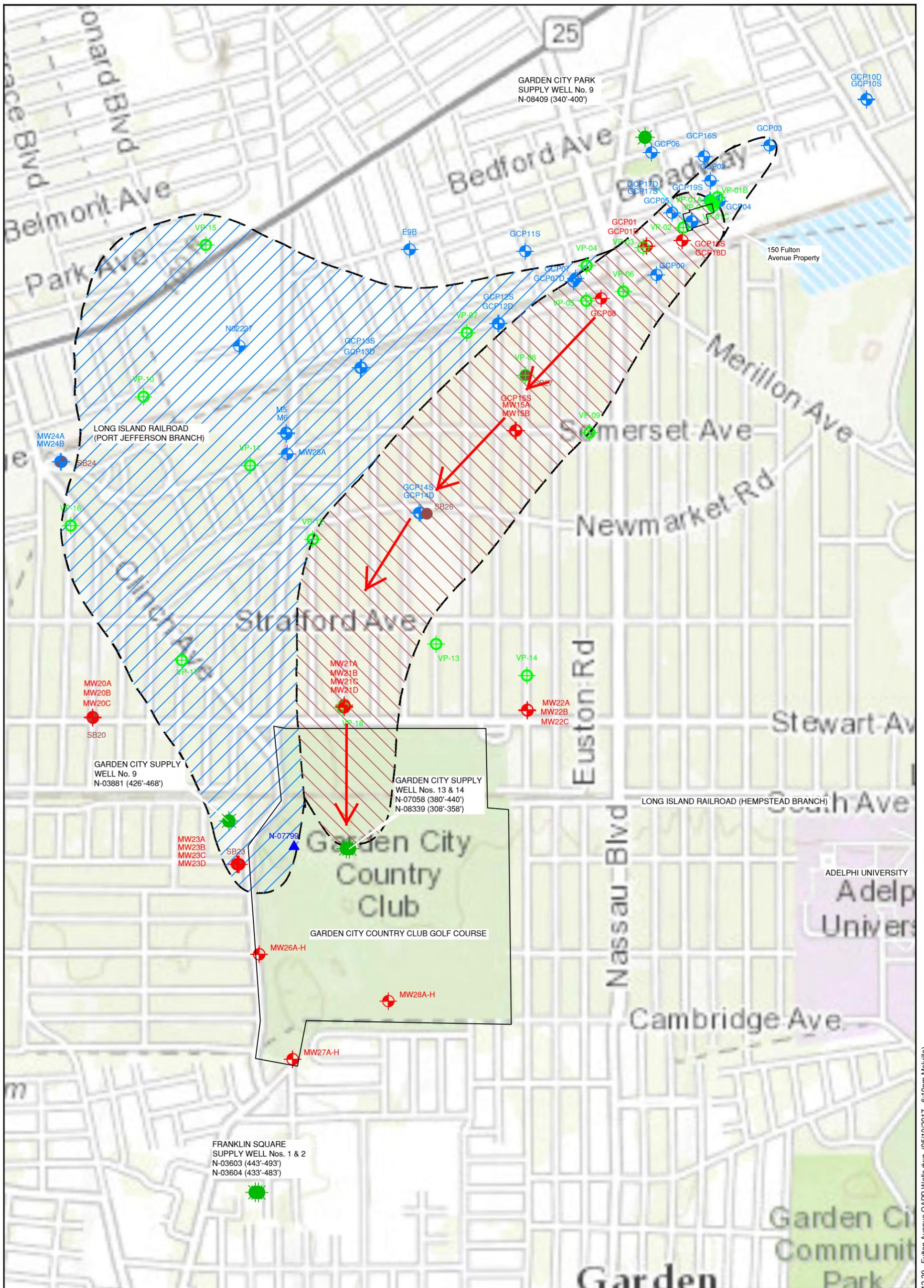
Sincerely,



Chris W. Wenczel, P.G.
Consultant Director/Hydrogeologist
Attachments

cc: Andrea Leshak, Esq., USEPA
Doug Garbarini, USEPA
Robert Kambic, USDOJ
Steven M. Scharf, P.E., NYSDEC

John Swartwout, NYSDEC
Scott Becker, Genesco Inc.
Paul Williams, Genesco Inc.
Thor Urness, Esq., Bradley
Jeff Sheehan, Esq., Bradley
Melissa Ballengee Alexander, Esq., Bradley
James Periconi, Esq., Periconi, LLC
James Perazzo, ERM Consulting & Engineering, Inc.



SB27 SOIL BORING LOCATION
 No. 9/N-03881 SUPPLY WELL
 (426'-468')=SCREEN INTERVAL
 N-07799 IRRIGATION WELL

Hatched patterns:

 [Blue Hatched] HISTORICAL EXTENT OF OU1 PLUME (TETRACHLOROETHENE {PCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/L*

 [Red Hatched] HISTORICAL EXTENT OF OU2 PLUME (TRICHLOROETHENE {TCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/L*

* NOTE:
 THE AREAL EXTENT OF CHLORINATED VOLATILE ORGANIC COMPOUNDS DEPICTED IN THIS FIGURE IS BASED ON THE MAXIMUM CONCENTRATIONS DETECTED IN GROUNDWATER SAMPLES OBTAINED FROM VERTICAL PROFILE TEMPORARY WELLS INSTALLED DURING 1999 - 2000, AND PERMANENT WELLS DURING SEPTEMBER 2001 - MAY 2005.

→ GENERALIZED GROUNDWATER FLOW PATH

TITLE Long-Term Groundwater Monitoring Well Network Well Locations Fulton Avenue Superfund Site Garden City/Garden City Park, NY			
PREPARED FOR Genesco Inc.			
Environmental Resources Management <small>ERM</small>			FIGURE 1
DRAWN BY EMF	SCALE AS SHOWN	DATE 10/04/16	JOB NO. 0097881

FIGURE 2
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - DECEMBER 2019
PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK

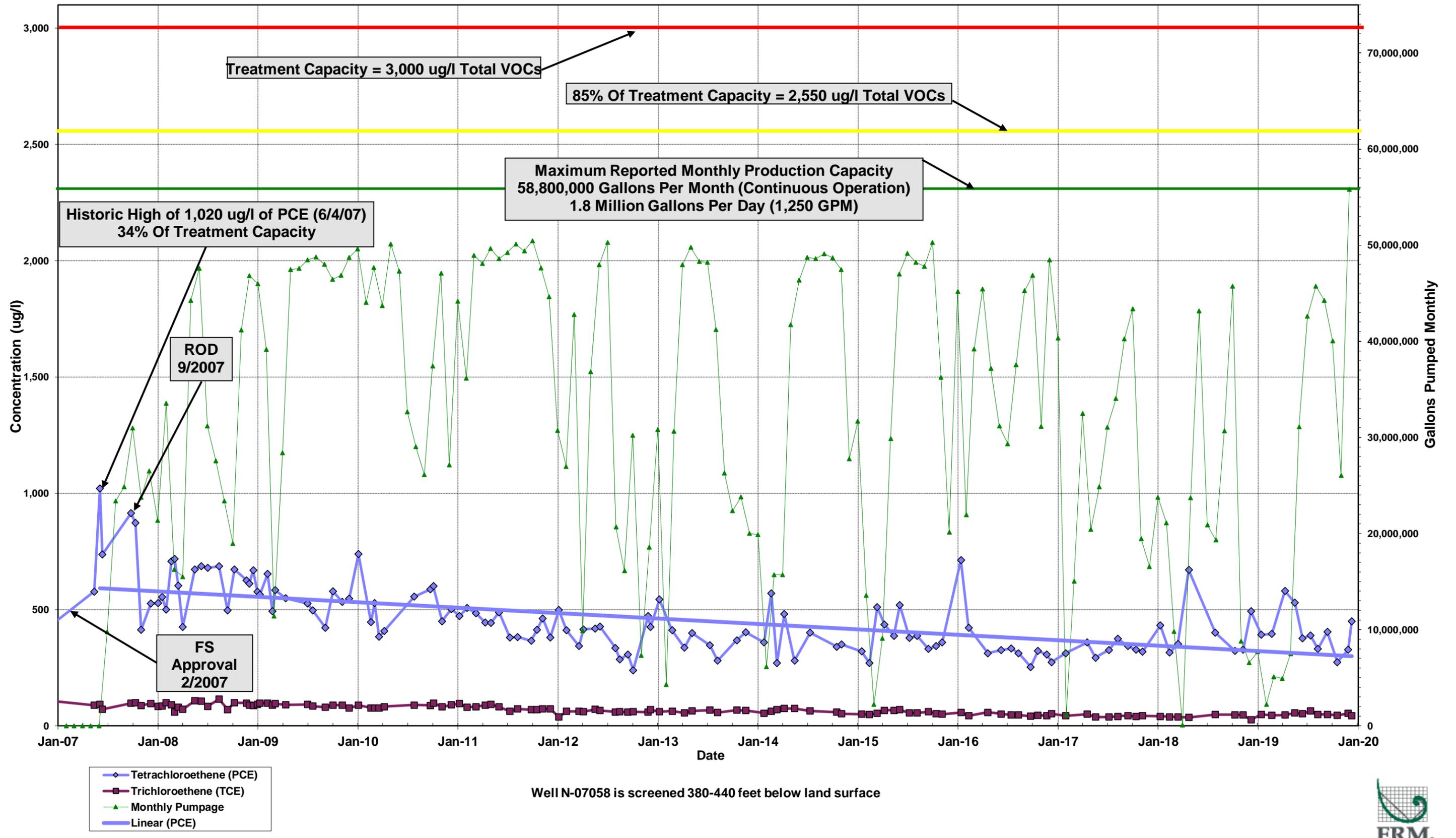


FIGURE 3
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - DECEMBER 2019
PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK

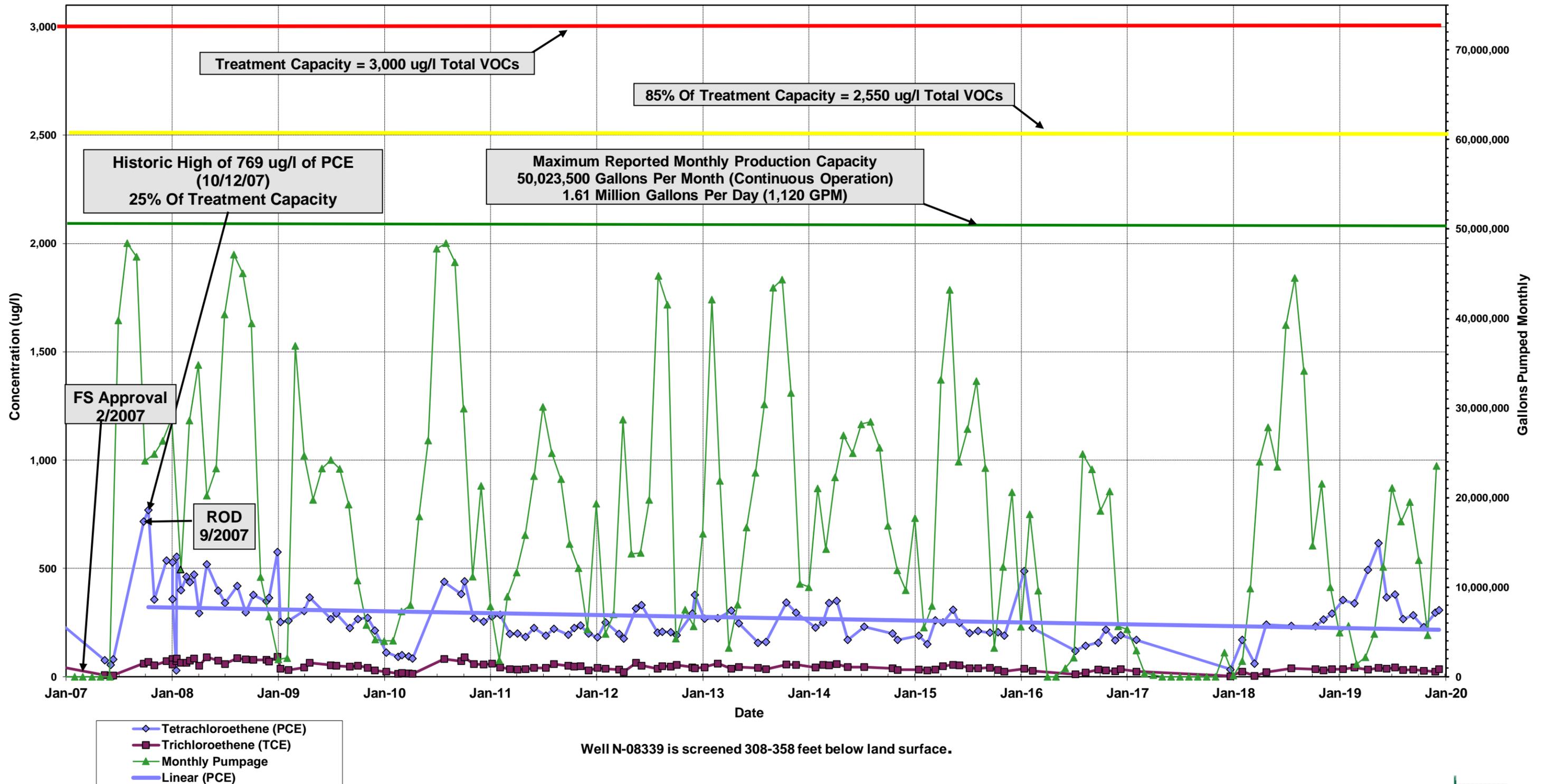


FIGURE 4
HISTORIC AVERAGE TETRACHLOROETHENE AND TRICHLOROETHENE CONCENTRATIONS BY YEAR 2001 - 2019
GARDEN CITY PUBLIC WATER SUPPLY WELL NOS. 9, 13 14, GARDEN CITY, NEW YORK



	Year	2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019	
		Compound	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE													
Well No. 13 (N-07058)	Average Concentration	128.0	57.8	211.8	67.0	271.7	59.0	263.6	65.3	335.0	73.9	488.3	85.8	722.6	90.0	603.4	88.5	539.5	90.3	508.3	86.1	454.3	80.2	345.4	59.7	385.5	62.5	381.1	63.4	385.1	57.1	357.0	48.3	331.3	41.6	413.6	40.0	404.1	49.9
	Ratio PCE/TCE	2.2		3.2		4.6		4.0		4.5		5.7		8.0		6.8		6.0		5.9		5.7		5.8		6.2		6.0		6.7		7.4		8.0		10.3		8.1	
Well No. 14 (N-08339)	Average Concentration	152.0	83.6	168.7	68.2	243.3	76.2	168.6	46.9	264.2	58.6	385.0	66.5	370.1	38.9	412.4	75.0	278.1	46.3	241.2	46.2	222.8	41.7	244.1	43.1	255.8	46.6	242.1	45.9	219.9	38.8	213.6	27.1	102.0	13.1	213.6	26.5	357.5	34.5
	Ratio PCE/TCE	1.8		2.5		3.2		3.6		4.5		5.8		9.5		5.5		6.0		5.2		5.3		5.7		5.5		5.3		5.7		7.9		7.8		8.1		10.4	
Well No. 9 (N-03881)	Average Concentration	2.1	7.0	6.6	37.5	7.9	44.0	11.6	76.0	13.7	92.0	21.0	93.0	31.6	109.0	32.0	94.8	36.4	97.5	33.9	84.6	42.0	90.0	35.7	78.1	39.5	80.2	40.1	79.6	42.8	81.2	41.8	79.8	39.4	81.2	Not Operated / Not Sampled			
	Ratio PCE/TCE	0.3		0.2		0.2		0.2		0.1		0.3		0.3		0.3		0.4		0.4		0.5		0.5		0.5		0.5		0.5		0.5		0.5		Not Operated / Not Sampled			

Concentrations are in ug/l (ppb).

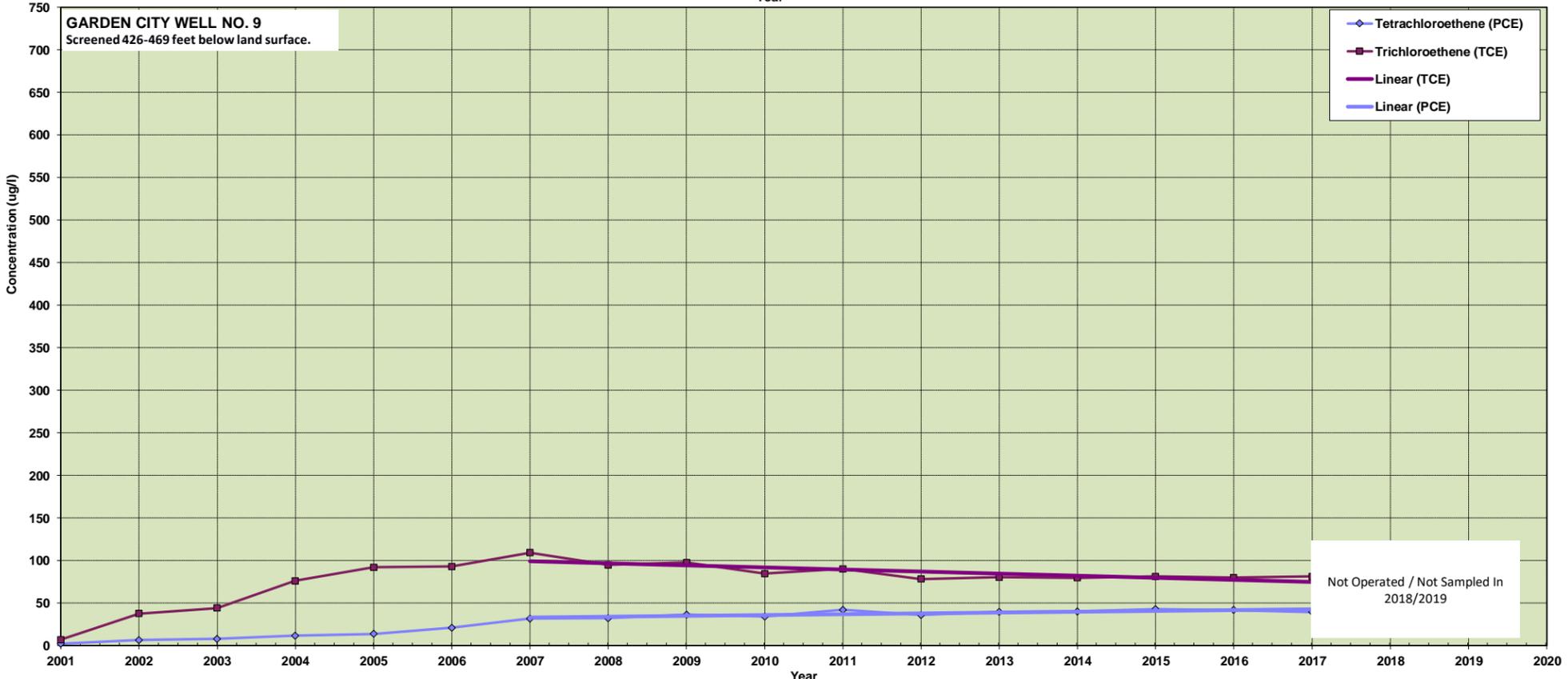
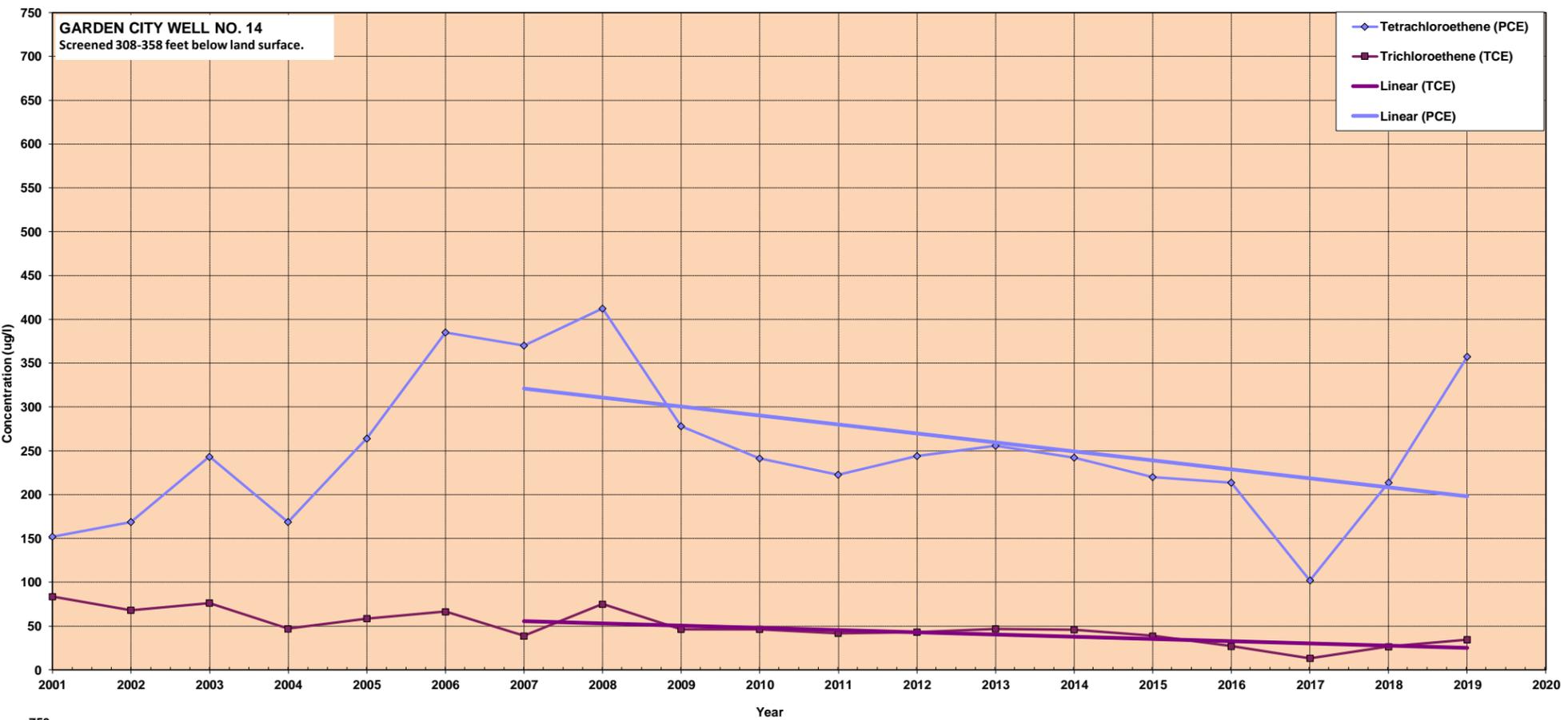
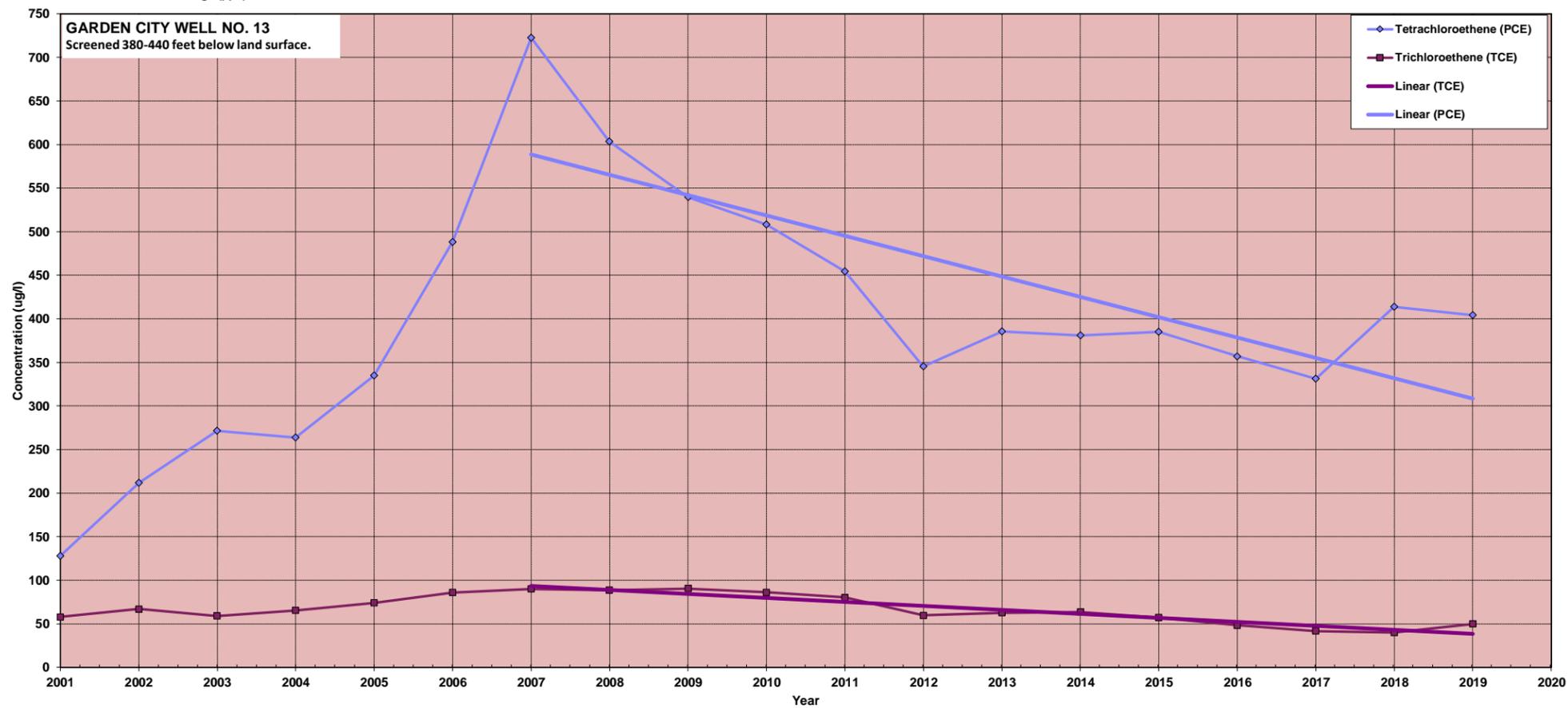


Table 1
OU1 Long-Term Monitoring Well Sampling Program
Fulton Avenue Superfund Site
Garden City Park, New York



Per 2016 SOW Attachment 1: Monitoring Well Sampling Program

Group 1 Wells are as follows:

GCP-01 S/D
GCP 08
GCP-18 S/D
GCP-15S
MW15 A-B
MW20 A-C
MW22 A-C
MW23 A-D

Group 1 Wells shall be sampled and analyzed at the following frequency:

The first sampling round shall commence within 20 days of EPA approval of the RD Work Plan, and sampling shall be performed every 24 months thereafter.

Group 2 Wells are as follows:

MW21 A-D

Group 2 Wells shall be sampled and analyzed at the following frequency:

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 – semi-annually (every six months)
Year 3 – semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

Group 3 Wells are as follows:

MW26 A-H
MW27 A-H
MW28 A-H

Group 3 Wells shall be sampled and analyzed at the following frequency:

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 – 9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)
Year 3 – 9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.



ATTACHMENT 1

GROUNDWATER MONITORING WELL REPAIR PHOTO LOG



Photograph: 1 | MW20A



Photograph: 2 | MW20B



Fulton Avenue Superfund Site
MW20 Jackson Street & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 3 | MW20C



Fulton Avenue Superfund Site
MW20 Jackson Street & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 4 | MW21A



Photograph: 5 | MW21B



Fulton Avenue Superfund Site
MW21 Wickham Road & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 6 | MW21C



Photograph: 7 | MW21D



Fulton Avenue Superfund Site
MW21 Wickham Road & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 8 | MW22A



Photograph: 9 | MW22B



Fulton Avenue Superfund Site
MW22 Roxbury Road & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19

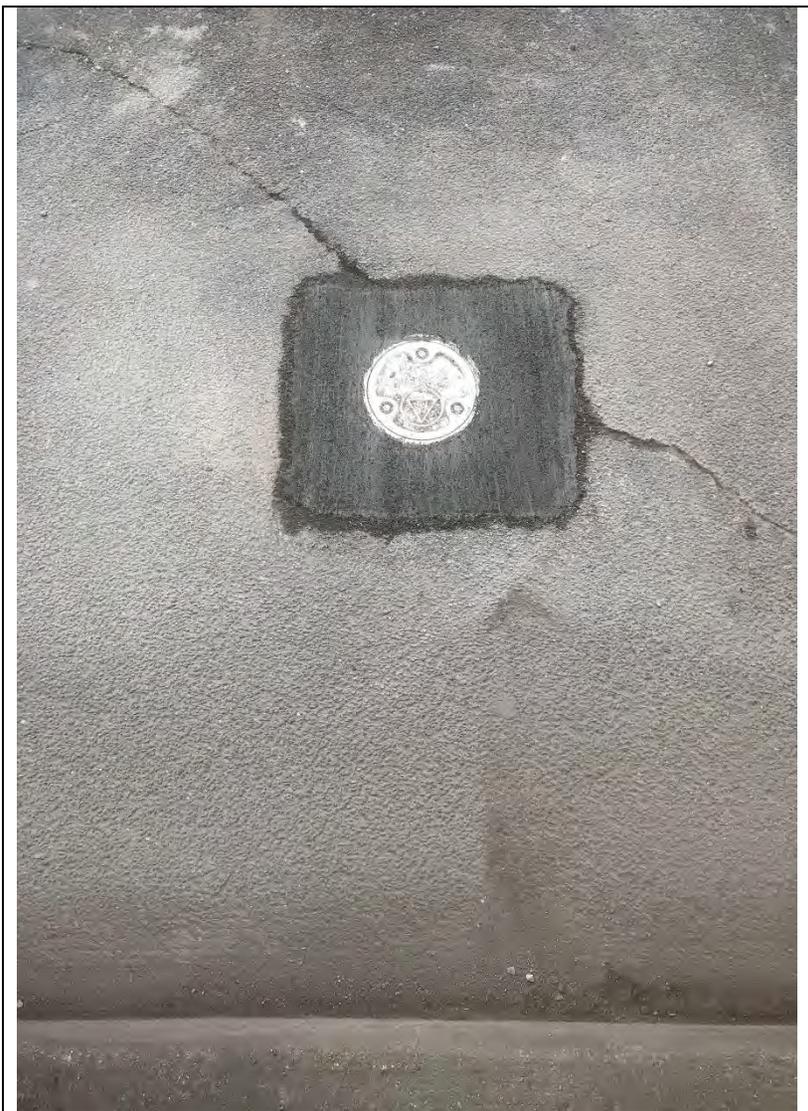


Photograph: 10 | MW22C



Fulton Avenue Superfund Site
MW22 Roxbury Road & Stewart Avenue, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 11 | MW23A



Photograph: 12 | MW23B



Fulton Avenue Superfund Site
MW23 Yale Street & Edgemere Road, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19



Photograph: 13 | MW23C



Photograph: 14 | MW23D



Fulton Avenue Superfund Site
MW23 Yale Street & Edgemere Road, Garden City NY
ERM Project Number 0097881

Date: 9/9/19 – 9/12/19