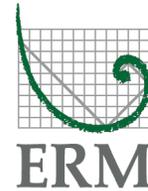


4 August 2021
ERM Reference No. 0506713

105 Maxess Road
Suite 316
Melville, NY 11747
(631) 756-8900
<http://www.erm.com>

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: Second Quarter 2021 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 Second Quarter 2021 (April – June) 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. During 2019-2020, an OU1 Remedial Action (RA) Report was prepared, submitted to, and approved by EPA on 13 November 2020. Remaining OU1 RA activities for which the Settling Defendant is responsible are:

- Long-term groundwater monitoring and reporting (Table 1 & Figure 1) and maintenance of the associated groundwater monitoring wells; and
- The sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property.

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 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 Site Management Plan).

Long-term groundwater monitoring is now in Year 4. The next long-term groundwater monitoring event will occur in September 2021 in accordance with the sampling schedule where every 24 months Group 1 wells (GCP-01 S/D, 08, 15S, 18S/D, MWs-15 A-B, 20 A-C, 22 A-C, 23 A-D) are to be sampled.

Year 4 sampling does not include sampling Group 2 (MWs 21A-D) and Group 3 wells (MWs 26A-H, 27A-H, 28A-H). Long-term groundwater monitoring well network locations are shown on the map presented as Figure 1.

150 Fulton Avenue Sub-Slab Depressurization System (SSDS)

Monthly drive-by checks confirm the SSDS fan continues to operate.

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. The VGC provided a new set of sampling results and pumpage records for VGC water supply wells 9, 13 and 14 for the period of April – June 2021.

The pumpage records indicate Well No. 13 was used as the primary supply well during January 2021 – June 2021 while in contrast, Well No. 14 was used little during the same time period. According to the VGS, influent (raw) water samples were not collected from Well No. 14 during April 2021 – June 2021. Nearby Well No. 9 was operated very little between the summer of 2017 and May of 2020, intermittently during June 2020 – November 2020, little during December 2020 – March 2021, but was used more heavily during April -June 2021.

The new data were incorporated into the existing database, 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 – 2020), and plots of average annual PCE and TCE concentrations versus time for each of the three wells for comparison. The data and resultant plots indicate that concentrations of PCE have fluctuated over time since 2007, but both maximum observed and annual average concentrations of PCE have been declining over time 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)	2020 Average (µg/L)	Difference of Averages	% Change of Averages
No. 13 (N-07058)	6/4/2007				
PCE	1,020	722.6	407.1	-315.5	-44%
TCE	91.5	90.0	35.0	-45.0	-50%
No. 14 (N-08339)	10/27/2007				
PCE	769	370.1	343.8	-26.3	-7%
TCE	69	38.9	34.5	-4.4	-11%

UPCOMING ACTIVITIES

Long-Term Groundwater Monitoring

The next long-term groundwater monitoring event will occur in September 2021 in accordance with the sampling schedule where every 24 months Group 1 wells (GCP-01 S/D, 08, 15S, 18S/D, MWs-15 A-B, 20 A-C, 22 A-C, 23 A-D) are to be sampled.

150 Fulton Avenue Sub-Slab Depressurization System (SSDS)

Continued monthly checks to confirm the SSDS fan is operating.

VGC Water Supply Well Monitoring

A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 for July 2021 through September 2021 will be obtained, and the updated charts and tables will be presented in the Third Quarter 2021 Progress Report in October 2021.

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
Matthew Silverman, USDOJ
Steven M. Scharf, P.E., NYSDEC
John Swartwout, NYSDEC
Scott Becker, 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.

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:

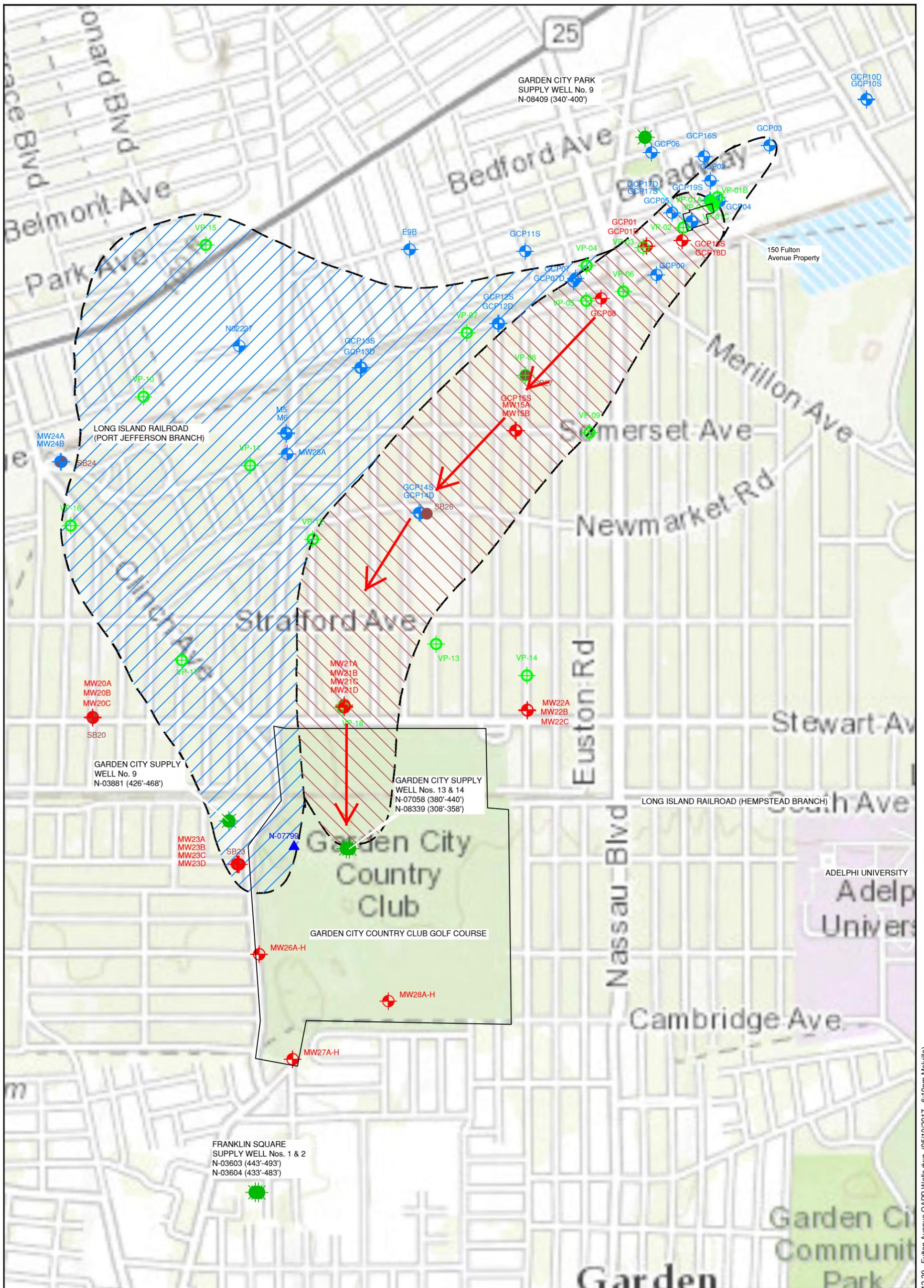
Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 – semi-annually (every six months)
Year 3 – semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

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.



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 - JUNE 2021
PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK

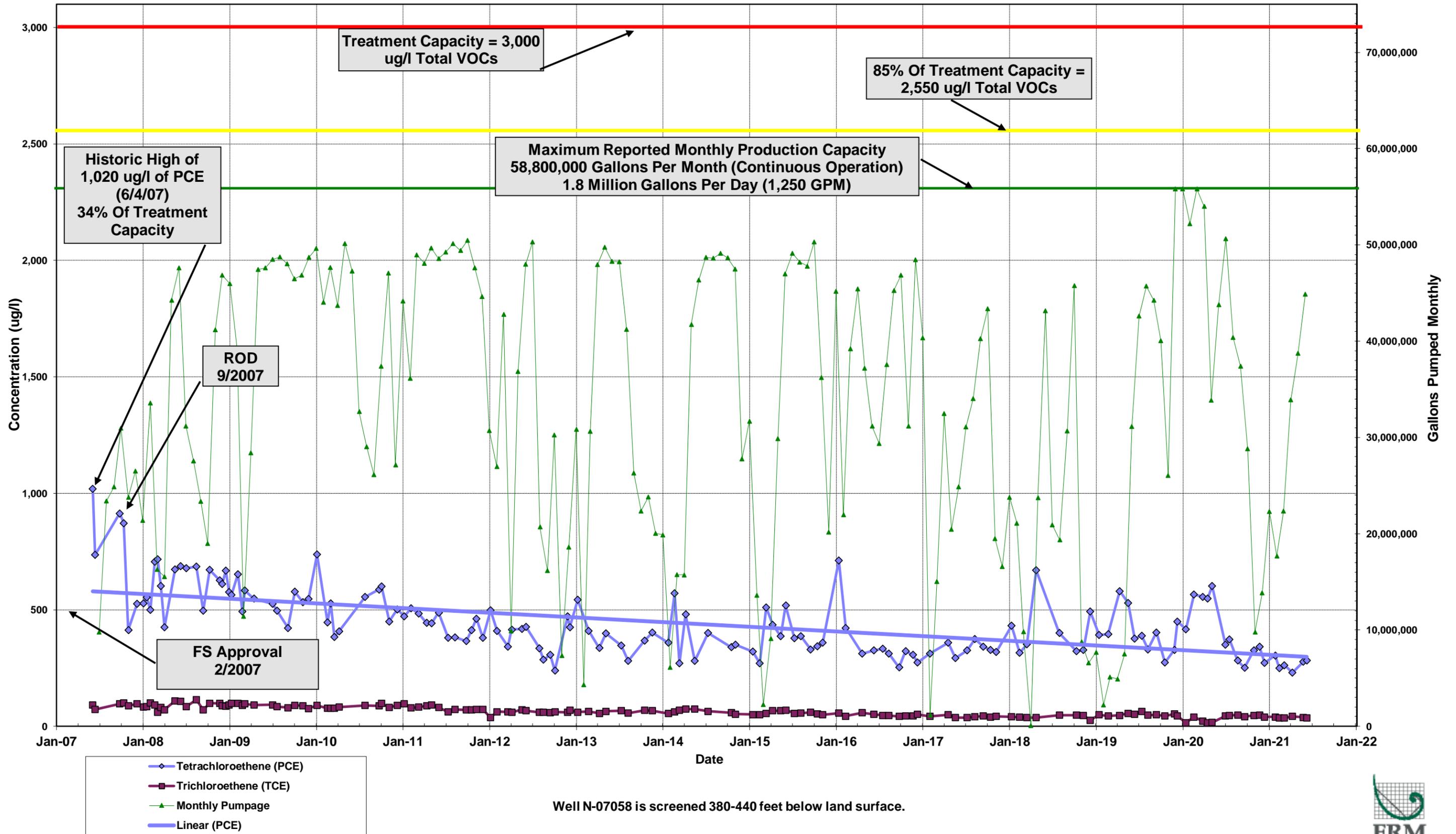
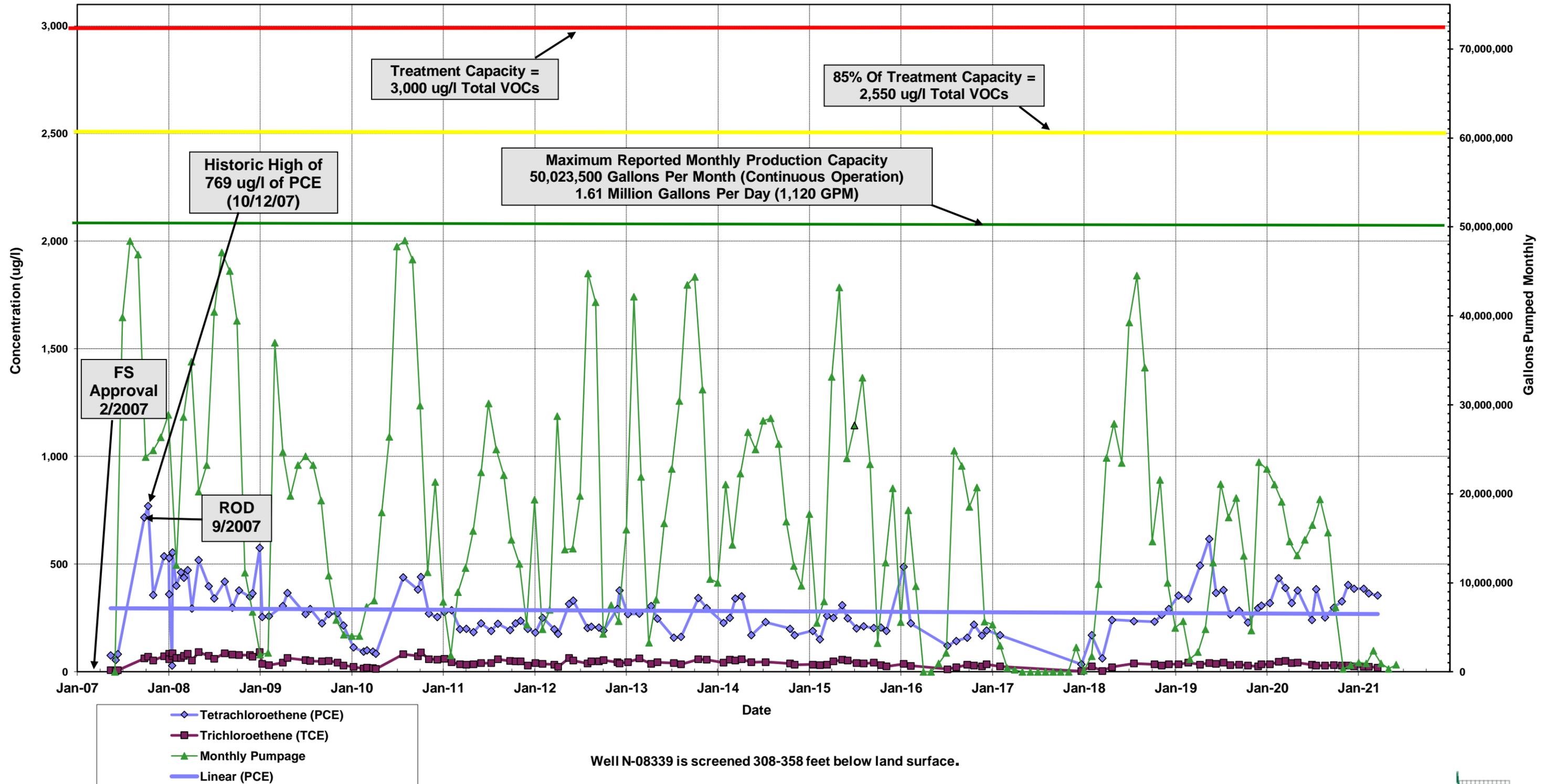


FIGURE 3
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - JUNE 2021
PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK



Well N-08339 is screened 308-358 feet below land surface.



FIGURE 4
HISTORIC AVERAGE TETRACHLOROETHENE AND TRICHLOROETHENE CONCENTRATIONS BY YEAR 2001 - 2020
GARDEN CITY PUBLIC WATER SUPPLY WELL NOS. 9, 13 14, GARDEN CITY, NEW YORK



Well No.	Year	2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019		2020				
		PCE	TCE	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	407.1	35.0			
	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		10.4		11.6		
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	343.8	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		10.0				
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				43.3	88.0			
	Ratio PCE/TCE	0.3		0.2		0.2		0.2		0.1		0.3		0.3		0.3		0.3		0.4		0.4		0.5		0.5		0.5		0.5		0.5		0.5		0.5								0.5

